

EXHIBIT 1

1

VOLUME 1
PAGES: 1-311
EXHIBITS: See Index

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST)
PUBLISHING CORPORATION,)
Plaintiffs and) C.A. No. 20-613 (LPS)
Counterdefendants,)
v.) HIGHLY CONFIDENTIAL
ROSS INTELLIGENCE, INC.,)
Defendant and)
Counterclaimant.)

)

VIDEOTAPED DEPOSITION of ANDREW ARRUDA

- CONDUCTED BY VIDEOCONFERENCE -

Wednesday, March 30, 2022

9:06 a.m. Pacific Daylight Time

Michelle Keegan, RMR, CRR

Lexitas

508-478-9795 ~ 508-478.0595 (Fax)

www.LexitasLegal.com

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Publishing

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Email: cberry@crowell.com
16 Counsel for Defendant ROSS Intelligence, Inc.

17

18 Also Present:
Adrian Beltran, Videographer

19

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EXHIBIT 2

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE
3 NO. 1:20-cv-00613-UNA.

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5 -----
6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST PUBLISHING
8 CORPORATION,

9 Plaintiffs,
10 - vs -
11 ROSS INTELLIGENCE INC.,
12 Defendant.
13 -----

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16 CONFIDENTIAL - ATTORNEYS' EYES ONLY
17 REMOTE TESTIMONY OF ANDREW ARRUDA

18 MAY 19, 2023 - 7:58 A.M. PDT

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24 JOB NO. 2023-895666

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3 MAY 19, 2023

4 7:58 A.M. PDT

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7 DEPOSITION of ANDREW ARRUDA, before S.

8 Arielle Santos, Certified Court Reporter,

9 Certified LiveNote Reporter and Notary Public.

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Andrew Arruda
May 19, 2023

3

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11 BY - CRINESHA BERRY, ESQ.

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16 ALSO PRESENT:

17 ROMAN BIELSKI, Kirkland Tech

18 BRYAN BELTRAN, Lexitas

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EXHIBIT 3

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE

4 -----X
5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE CENTRE GMBH and
7 WEST PUBLISHING CORPORATION,

8 Plaintiffs and
9 Counter-Defendants,

10 v.
11

12 ROSS INTELLIGENCE INC.,
13

14 Defendant and
15 Counterclaimant.

16 Case No. 20-613 (LPS)
17 -----X

18 ***HIGHLY CONFIDENTIAL***
19 ***OUTSIDE COUNSEL EYES ONLY***

20 VIDEOTAPED DEPOSITION OF KAI BOND
21
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DATE: May 10, 2023

TIME: 10:06 a.m. Eastern

PLACE: ***REMOTE***

BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

JOB NO: 2023-896317

2

1

2 APP E A R A N C E S:

3

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7 BY: CAMERON GINDER, ESQ.

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CROWELL & MORING LLP
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13 BY: ANNA SABER, ESQ.

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MONTGOMERY McCRACKEN WALKER & RHOADS LLP
17 Attorneys for the witness
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BY: TIM PASTORE, ESQ.

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ALSO PRESENT:

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Bryan Beltran, Lexitas

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Kai Bond
May 10, 2023

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EXHIBIT 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 THOMSON REUTERS ENTERPRISE CENTRE §
4 GMBH and WEST PUBLISHING §
5 CORPORATION, §
6 §
7 § C.A. No. 20-613-SB

8 Plaintiffs/Counterdefendants, §
9 §
10 vs. §
11 §
12 §
13 ROSS INTELLIGENCE, INC., §
14 §
15 Defendant/Counterclaimant, §
16 §
17 §
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22 §
23 REPORTED BY: §
24 Linda Russell, CSR §
25 JOB NO: 210749 §

10 HIGHLY CONFIDENTIAL

11 PURSUANT TO PROTECTIVE ORDER

12 VIDEO-RECORDED ORAL DEPOSITION OF

13 CHRISTOPHER CAHN

14 AS CORPORATE REPRESENTATIVE OF

15 MORAE GLOBAL CORPORATION

16 Houston, Texas

17 Thursday, May 12, 2022

18 (REPORTED REMOTELY)

19 REPORTED BY:

20 Linda Russell, CSR

21 JOB NO: 210749

Page 2

1 CAHN - MORAE GLOBAL

2

3

4 May 12, 2022

5 9:06 a.m.

6

7

8 DEPOSITION OF CHRISTOPHER CAHN, conducted
9 via Zoom, taken before Linda Russell, Certified
10 Court Reporter No. 2965, pursuant to the Federal
11 Rules of Civil Procedure for the United States
12 District Court pertaining to the taking of
13 depositions, in the City of Houston, Texas,
14 commencing at 9:06 a.m. Central Time, on
15 May 12, 2022.

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1 CAHN - MORAE GLOBAL

2 A P P E A R A N C E S

3 (All parties appearing remotely)

4

5 ON BEHALF OF PLAINTIFFS/COUNTERDEFENDANTS:

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MIRANDA MEANS, ESQ.

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New York, New York 10022

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9 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

10 WARRINGTON PARKER, ESQ.

JACOB CANTER, ESQ.

11 GABRIEL RAMSEY, ESQ.

Crowell & Moring

12 3 Embarcadero Center

San Francisco, California 94111

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17 600 Travis

Houston, Texas 77002

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20 Darryl Russell, Videographer

Bill Thomas, Exhibit Operator

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EXHIBIT 5

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE
3 Case No. 20-613 (LPS)

3 -----
4 IN RE MATTER OF:

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH and WEST
6 PUBLISHING CORPORATION,

6 Plaintiffs and
7 Counter-Defendants,

7 vs.

8 ROSS INTELLIGENCE INC.,

9 Defendant and
10 Counterclaimant.

11 -----

12 ** HIGHLY CONFIDENTIAL **

13 ** ATTORNEYS' EYES ONLY **

14

15 REMOTE VIDEOTAPED DEPOSITION OF

16 ALAN COX

17

18 Wednesday, August 9, 2023

19 10:01 a.m. (CST)

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23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-905292

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3 August 9, 2023

4 10:01 a.m. (CST)

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8 Highly Confidential Videotaped9 Deposition of ALAN COX, held remotely via
10 Zoom, before Joan Ferrara, a Registered
11 Merit Reporter, Federal Certified Realtime
12 Reporter and Notary Public.

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1 REMOTE APPEARANCES:

2

3 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

4 KIRKLAND & ELLIS LLP

5 200 Clarendon Street

6 Boston, Massachusetts 02116

7 BY: DANIEL LAYTIN, ESQ.

8 MAX SAMELS, ESQ.

9

10

11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 CROWELL & MORING LLP

13 3 Embarcadero Center

14 26th Floor

15 San Francisco, California 94111

16 BY: MATTHEW McBURNEY, ESQ.

17 BEATRICE NGUYEN, ESQ.

18

19

20 ALSO PRESENT:

21 VALERIE BELTRAN, Videographer

22 JEREMY YOUNG, Kirkland Tech

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EXHIBIT 6

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 THOMSON REUTERS ENTERPRISE CENTRE
4 GMBH and WEST PUBLISHING
5 CORPORATION,
6 Plaintiff/Counterdefendants,
7 v. Case No. 20-613-SB
8 ROSS INTELLIGENCE INC.,
9 Defendant/Counterclaimant.
10 _____/

11 HIGHLY CONFIDENTIAL

12 VIDEO-RECORDED DEPOSITION OF MICHAEL L. DAHN
13 (Conducted Via Videoconference)

14 DATE: May 23, 2023

15 TIME: 9:00 a.m. to 3:14 p.m.

16 PURSUANT TO: Notice by counsel for
17 Defendant/Counter-Claimant for
18 purposes of discovery, use at
19 trial or such other purposes as
20 are permitted under the Florida
Rules of Civil Procedure

21 BEFORE: Valerie A. Hance, RPR
22 Notary Public, State of
23 Florida at Large

24 Pages 1 to 163

25 HIGHLY CONFIDENTIAL

HIGHLY CONFIDENTIAL

1 APPEARANCES:

2 DANIEL E. LAYTIN, ESQUIRE
3 CAMERON GINDER, ESQUIRE
4 Kirkland & Ellis
5 300 North LaSalle
6 Chicago, Illinois 60654
7 dlaytin@kirkland.com
8 cameron.ginder@kirkland.com
9 -and-
10 JEANPIERRE J. GIULIANO, ESQUIRE
11 Thomson Reuters
12 Attorneys for Plaintiffs/Counter-Defendants

13 WARRINGTON S. PARKER III, ESQUIRE

14 ANNA Z. SABER, ESQUIRE
15 JACOB CANTER, ESQUIRE
16 Crowell & Moring LLP
17 3 Embarcadero Center
18 26th Floor
19 San Francisco, California 94111
warker@crowell.com
asaber@crowell.com
jcanter@crowell.com

20 Attorneys for Defendant/Counter-Claimant

21 ALSO PRESENT:

22 Jeremy Taylor, Videographer

23 I N D E X

24 DIRECT EXAMINATION BY MR. PARKER	Page 9
25 CERTIFICATE OF OATH	Page 160
REPORTER'S CERTIFICATE	Page 161

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EXHIBIT 7

2

1 VIDEOTAPED DEPOSITION OF PARGLES DALL'OGLIO

2 BE IT REMEMBERED that on Wednesday,

3 March 9, 2022, commencing at the hour of 9:28 a.m.

4 thereof, before me, Kathleen A. Maltbie,

5 RPR-RMR-CRR-CCRR-CLR-CRC, a Certified Stenographic

6 Shorthand Reporter, in and for the State of

7 California, personally appeared PARGLES DALL'OGLIO,

8 remotely via Zoom videoconference, a witness in the

9 above-entitled court and cause, who, being by me

10 first remotely duly sworn, was thereupon examined as

11 a witness in said action.

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3

1 APPEARANCES OF COUNSEL

2 FOR THE PLAINTIFFS AND COUNTERDEFENDANTS:

3 KIRKLAND & ELLIS LLP
4 601 Lexington Avenue
5 New York, New York 10022
6 BY: JOSHUA L. SIMMONS, ESQ.
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10 FOR THE DEFENDANT AND COUNTERCLAIMANT:

11 (Via Zoom Videoconference)
12 CROWELL & MORING LLP
13 Three Embarcadero Center, 26th Floor
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15 BY: KAYVAN M. GHAFFARI, ESQ.
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17 Telephone: (415) 365-7223
18 Email: Kghaffari@crowell.com
kcacabelos@crowell.com

19 ALSO PRESENT:

20 (Via Zoom Videoconference)
21 Jacob Figueroa, Videographer

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EXHIBIT 8

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 -----
16 ** HIGHLY CONFIDENTIAL **

17 ** ATTORNEYS' EYES ONLY **

18 REMOTE VIDEOTAPED DEPOSITION OF

19 JULIAN D'ANGELO

20 Wednesday, May 3, 2023

21 9:03 a.m. (EST)

22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892414

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3 May 3, 2023
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Videotaped Deposition of JULIAN

D'ANGELO, held remotely via Zoom, before
Joan Ferrara, a Registered Merit Reporter,
Federal Certified Realtime Reporter and
Notary Public.

3

1 REMOTE APPEARANCES:

4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: CAMERON GINDER, ESQ.

11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 CROWELL & MORING LLP

13 3 Embarcadero Center

14 26th Floor

15 San Francisco, California 94111

16 BY: WARRINGTON PARKER, ESQ.

19 ALSO PRESENT:

20 BRYAN BELTRAN, Videographer

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EXHIBIT 9

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3 No. 1:20-cv-00613-UNA

4

5 -----

6 THOMSON REUTERS ENTERPRISE

7 CENTRE GMBH and WEST PUBLISHING

8 CORPORATION,

9 Plaintiffs,

10 -vs-

11 ROSS INTELLIGENCE INC.,

12 Defendant.

13 -----

14

15

16 HIGHLY CONFIDENTIAL

17 REMOTE TESTIMONY OF GILLIAN HADFIELD, PhD

18 AUGUST 9, 2023 - 10:00 A.M. CDT

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24 JOB NO. 2023-905293

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3 AUGUST 9, 2023

4 10:00 A.M. CDT

5
6
7 DEPOSITION of GILLIAN HADFIELD, PhD,
8 before S. Arielle Santos, Certified Court
9 Reporter, Certified LiveNote Reporter and Notary
10 Public.

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3

1 REMOTE APPEARANCES:

2
3 COUNSEL FOR PLAINTIFF:

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10

11 COUNSEL FOR DEFENDANT:

12 BY - WARRINGTON PARKER

13 BY - CRINESHA BERRY

14 CROWELL & MORING LLP

15 3 Embarcadero Center, 26th Floor

16 San Francisco, CA 94111

17

18 ALSO PRESENT:

19 JOSE LOPEZ, Kirkland Tech

20 ADRIAN BELTRAN, Lexitas

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EXHIBIT 10

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3

4 IN RE MATTER OF:)
5 THOMSON REUTERS) C.A. No. 20-613 (LPS)
6 ENTERPRISE CENTRE GMBH)
7 and WEST PUBLISHING)
8 CORPORATION,)
9 Plaintiffs and)
10 Counterdefendants,)
11 VS.)
12 ROSS INTELLIGENCE,)
13 INC.,)
14 Defendant and)
15 Counterclaimant.)
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19 ORAL AND VIDEOTAPED DEPOSITION
20 OF
21 TARIQ HAFEEZ
22 MAY 26, 2022

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3 ORAL AND VIDEOTAPED DEPOSITION OF
4 TARIQ HAFEEZ, produced as a witness at the
5 instance of the Plaintiff and
6 Counterdefendants and duly sworn, was taken in
7 the above-styled and numbered cause on
8 May 26, 2022, from 9:07 a.m. to 4:11 p.m.,
9 before KATERI A. FLOT-DAVIS, CSR, CCR, in and
10 for the State of Texas, reported by machine
11 shorthand, pursuant to the Federal Rules of
12 Civil Procedure and the provisions stated on
13 the record herein.

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1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFF:

4 JOSHUA SIMMONS, ESQ
ERIC LOVERRO, ESQ.
5 Kirkland & Ellis LLP
601 Lexington Avenue
6 New York, New York 10077
joshua.simmons@kirkland.com
7 eric.loverro@kirkland.com

8

9 FOR THE DEFENDANT:

10 WARRINGTON PARKER, ESQ.
CRINISHA BERRY, ESQ.
11 GABRIEL RAMSEY, ESQ.
Crowell & Moring LLP
12 3 Embarcadero Center
26th Floor
13 San Francisco, California 94111
wparker@crowell.com
14 cberry@crowell.com
gramsey@crowell.com

15

16

FOR THE WITNESS TARIQ HAFEEZ:

17 TARIK D. TURFE, ESQ.
18 Hammoud Dakhlallah & Associates
6050 Greenfield
19 Ste. 201
Dearborn, Michigan 48126
20 tt@hdalawgroup.com

21

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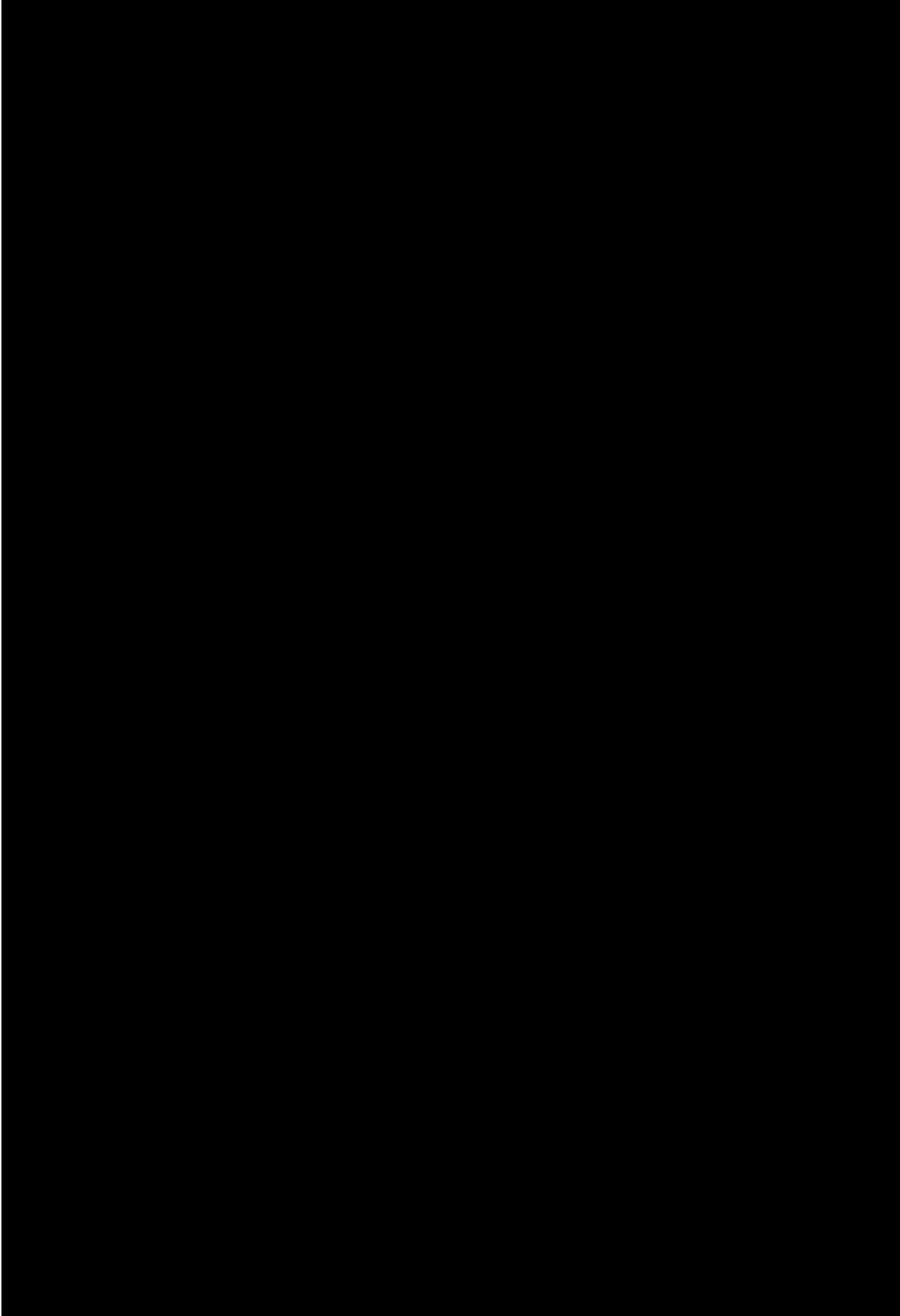
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Kimberly Villalobos, Videographer

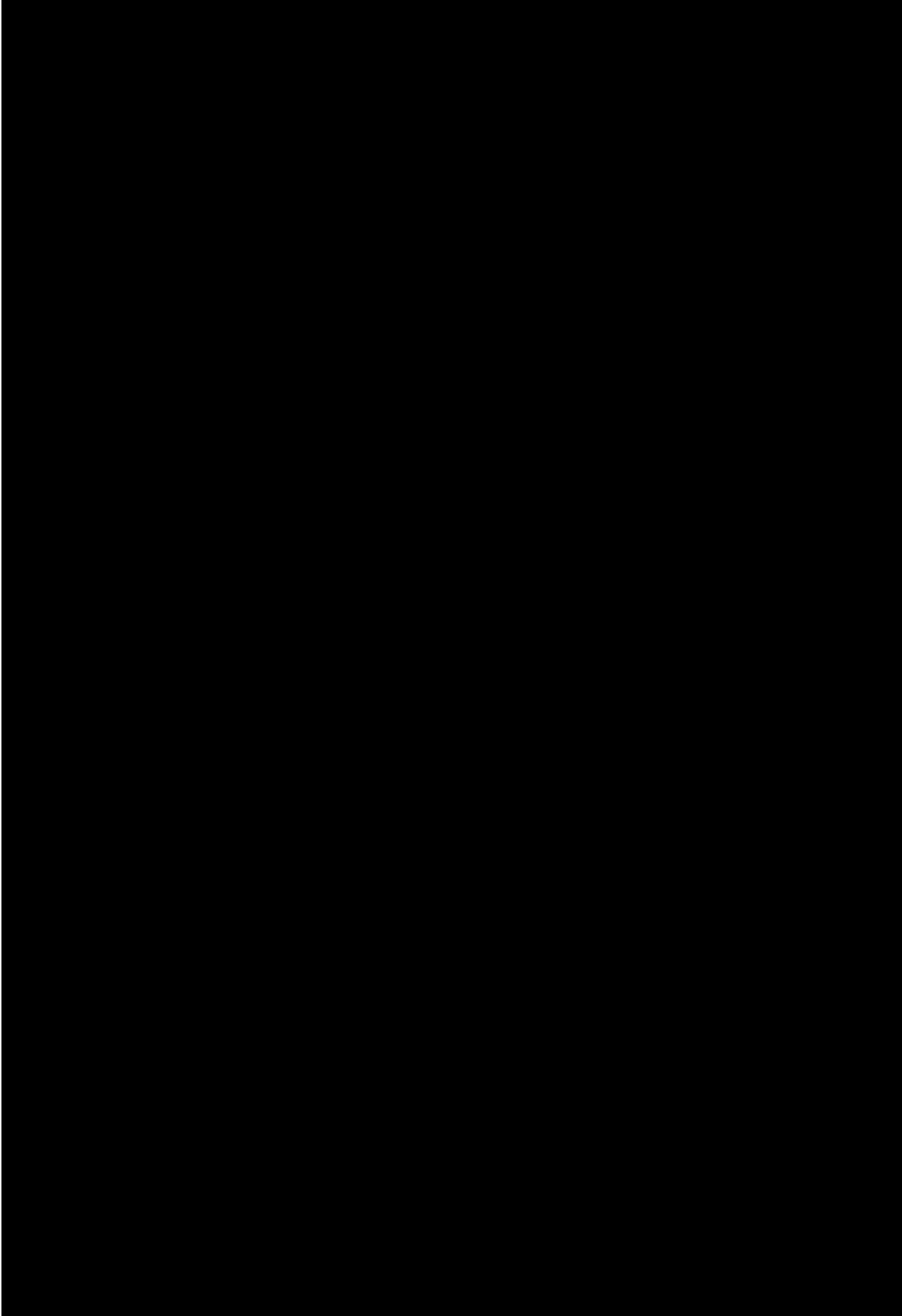
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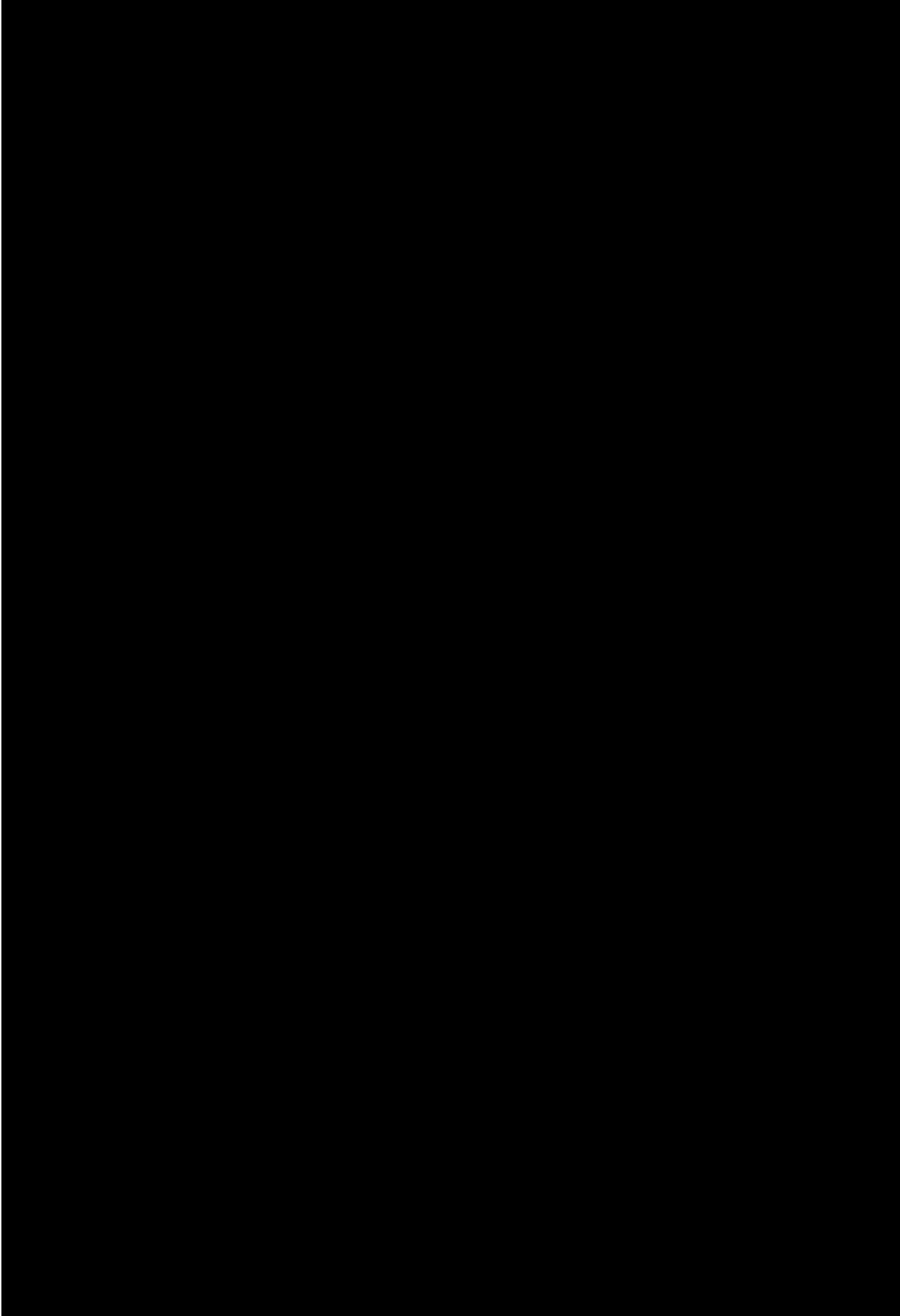
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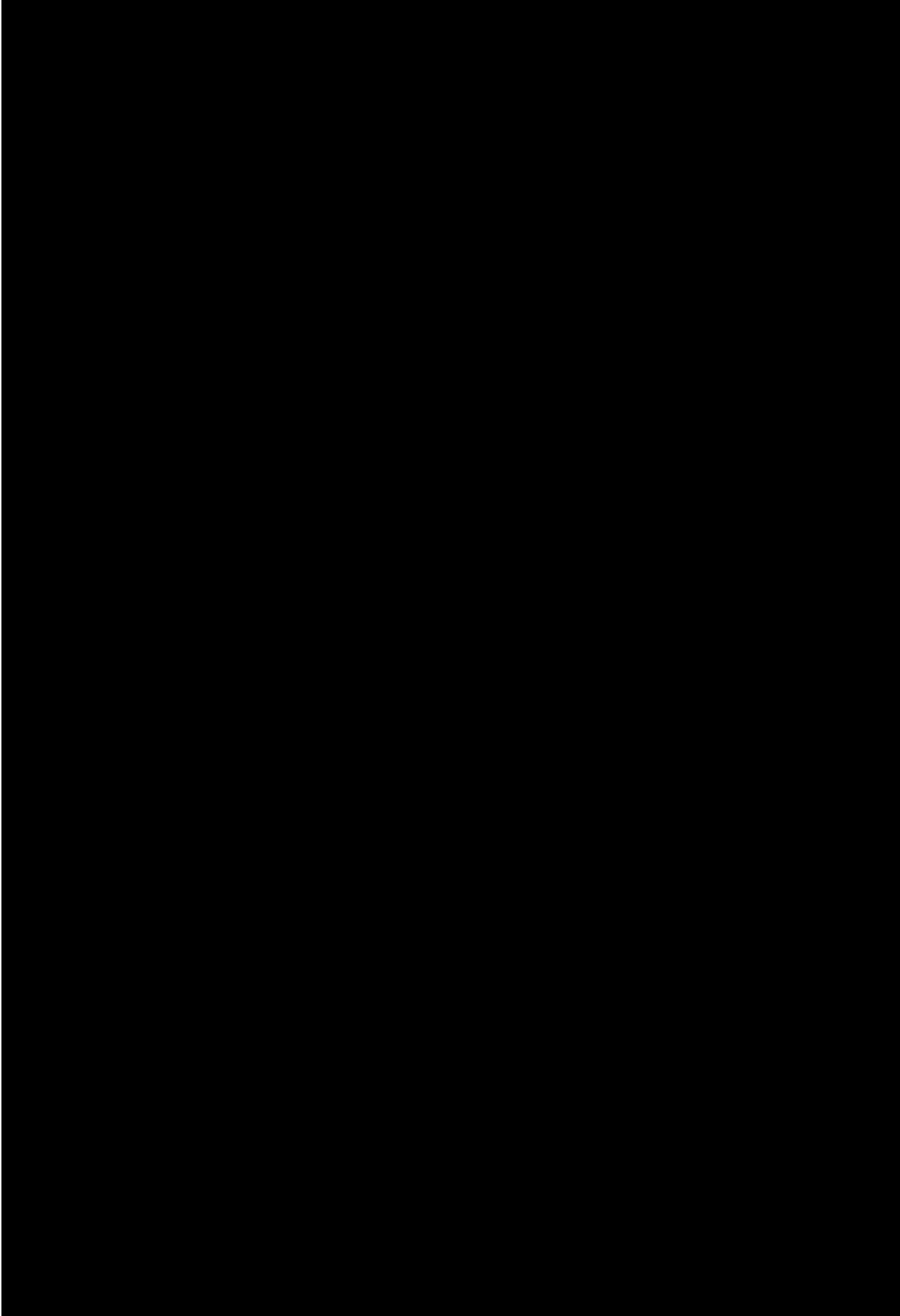
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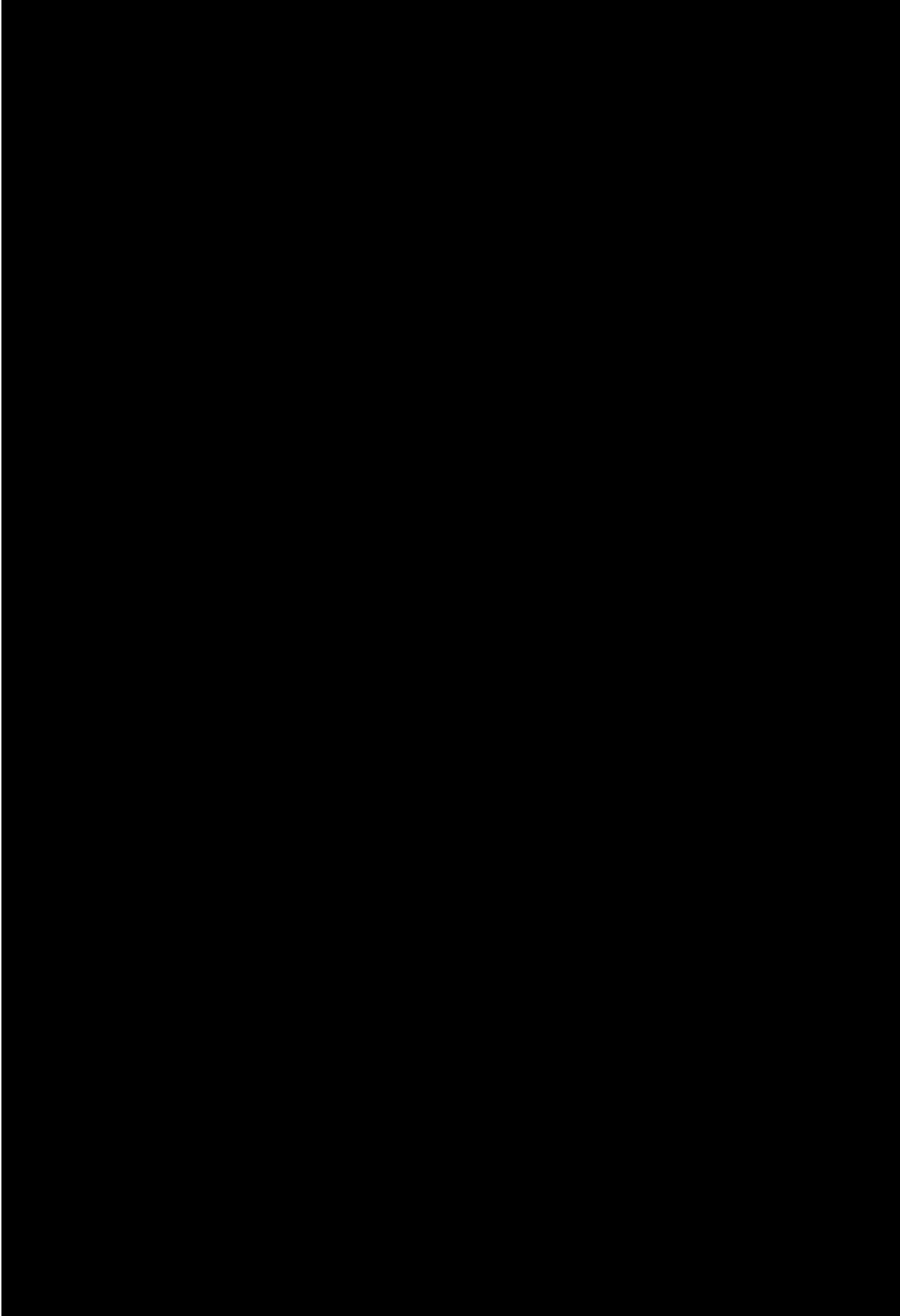


EXHIBIT 11

1

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3
4 THOMAS REUTERS ENTERPRISE)
5 CENTRE GMBH and WEST)
6 PUBLISHING CORPORATION,)
7 Plaintiffs and)
8 Counterdefendants,)
9 VS.) C.A. NO. 20-613 (LPS)
10 ROSS INTELLIGENCE INC.,)
11 Defendant and)
12 Counterclaimant.)
13 _____
14
15
16 VIDEOTAPED IN-PERSON DEPOSITION OF
17 THOMAS HAMILTON
18 MONDAY, APRIL 18, 2022
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24 STENOGRAPHIC REPORTER: CHRISTA YAN, CSR NO. 14316
25

2

1 APPEARANCES IN-PERSON:

2 FOR PLAINTIFFS AND COUNTERDEFENDANTS THOMAS REUTERS
3 ENTERPRISE CENTRE GMBH AND WEST PUBLISHING CORPORATION:
4 KIRKLAND & ELLIS LLP
5 BY: MIRANDA MEANS, ATTORNEY-AT-LAW
6 ROMA LOPES
7 200 Clarendon Street
8 Boston, Massachusetts 02116
9 (617) 385-7500
10 thomson-ross@kirkland.com

11 FOR DEFENDANT AND COUNTER-CLAIMANT:
12 CROWELL & MORING LLP
13 BY: CHRISTOPHER BANKS, ATTORNEY-AT-LAW
14 ANNA SABER
15 3 Embarcadero Center, 26th Floor
16 San Francisco, California 94111
17 (415) 365-7452
18 cbanks@crowell.com
19 asaber@crowell.com

20 ALSO PRESENT:
21 ANTONIO WOODWARD, The Videographer

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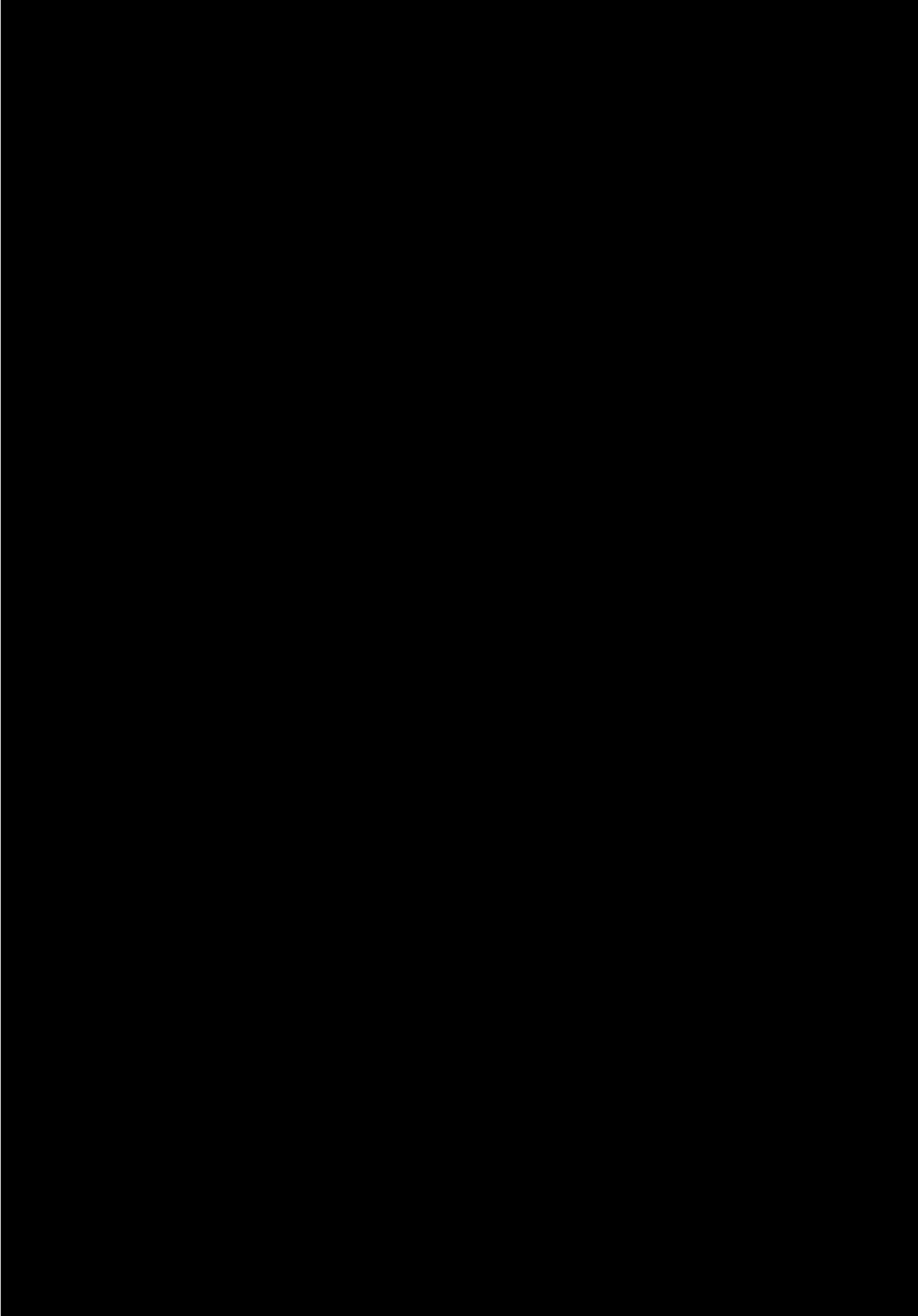


EXHIBIT 12

Thomas Hamilton
May 04, 2023

1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
Case No. 20-613 (LPS)

4 IN RE MATTER OF:

5 THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
6 PUBLISHING CORPORATION,

7 Plaintiffs and
Counter-Defendants,

8 vs.

9 ROSS INTELLIGENCE INC.,

10 Defendant and
11 Counterclaimant.

13 ** HIGHLY CONFIDENTIAL **

14 ** ATTORNEYS' EYES ONLY **

15
16 REMOTE VIDEOTAPED DEPOSITION OF
17 THOMAS HAMILTON

18
19 Thursday, May 4, 2023

20 11:57 a.m. (EST)

21
22
23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892415

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4 May 4, 2023

5 11:57 a.m. (EST)

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9 Videotaped Deposition of THOMAS
10 HAMILTON, held remotely via Zoom, before
11 Joan Ferrara, a Registered Merit Reporter,
12 Federal Certified Realtime Reporter and
13 Notary Public.

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Thomas Hamilton
May 04, 2023

3

1 REMOTE APPEARANCES:

4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: CHRISTA COTTRELL, ESQ.

9 LEXI WUNG, ESQ.

10
11
12 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

13 CROWELL & MORING LLP

14 3 Embarcadero Center

15 26th Floor

16 San Francisco, California 94111

17 BY: JOACHIM STEINBERG, ESQ.

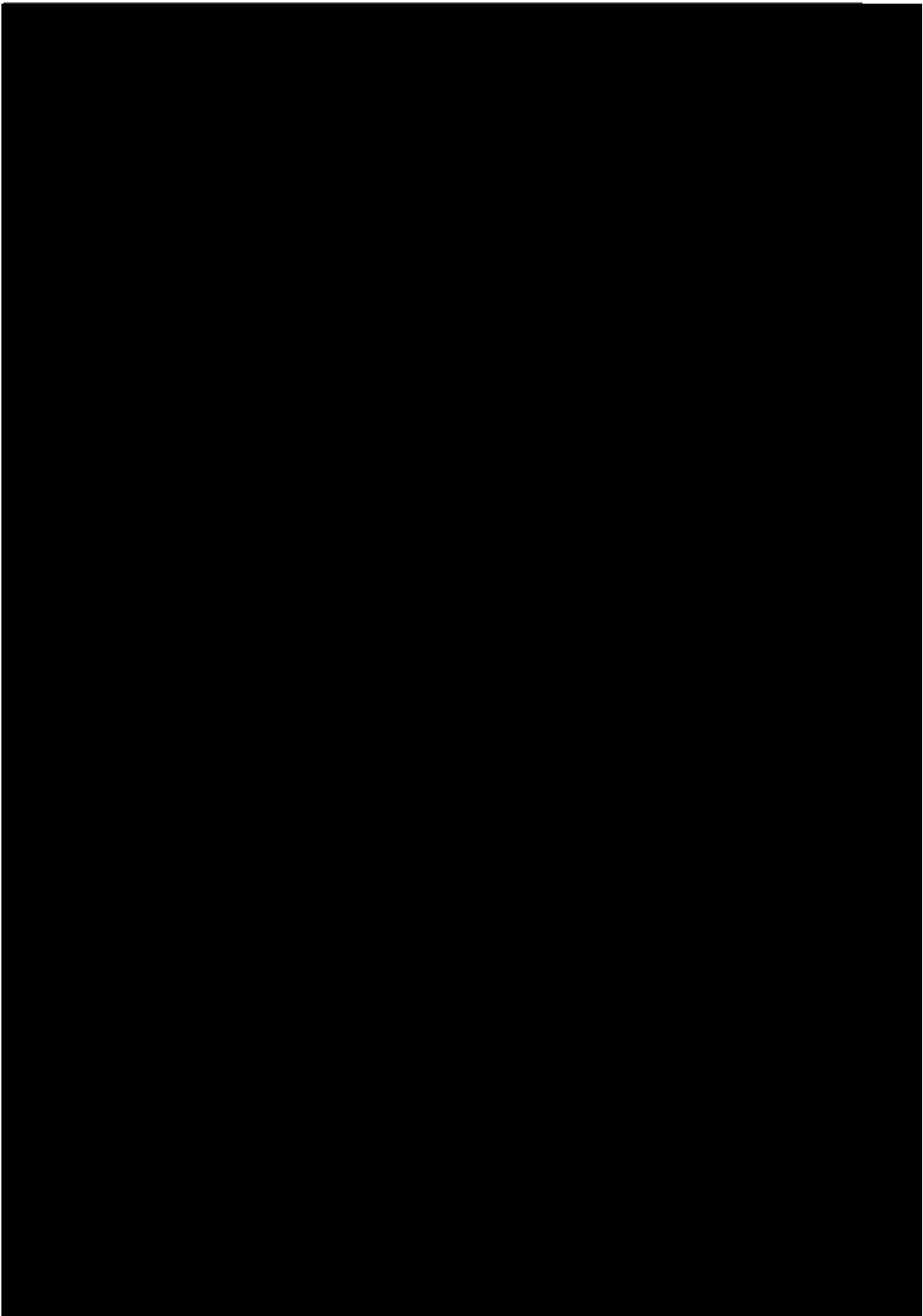
18 ANNA SABER, ESQ.

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21 ALSO PRESENT:

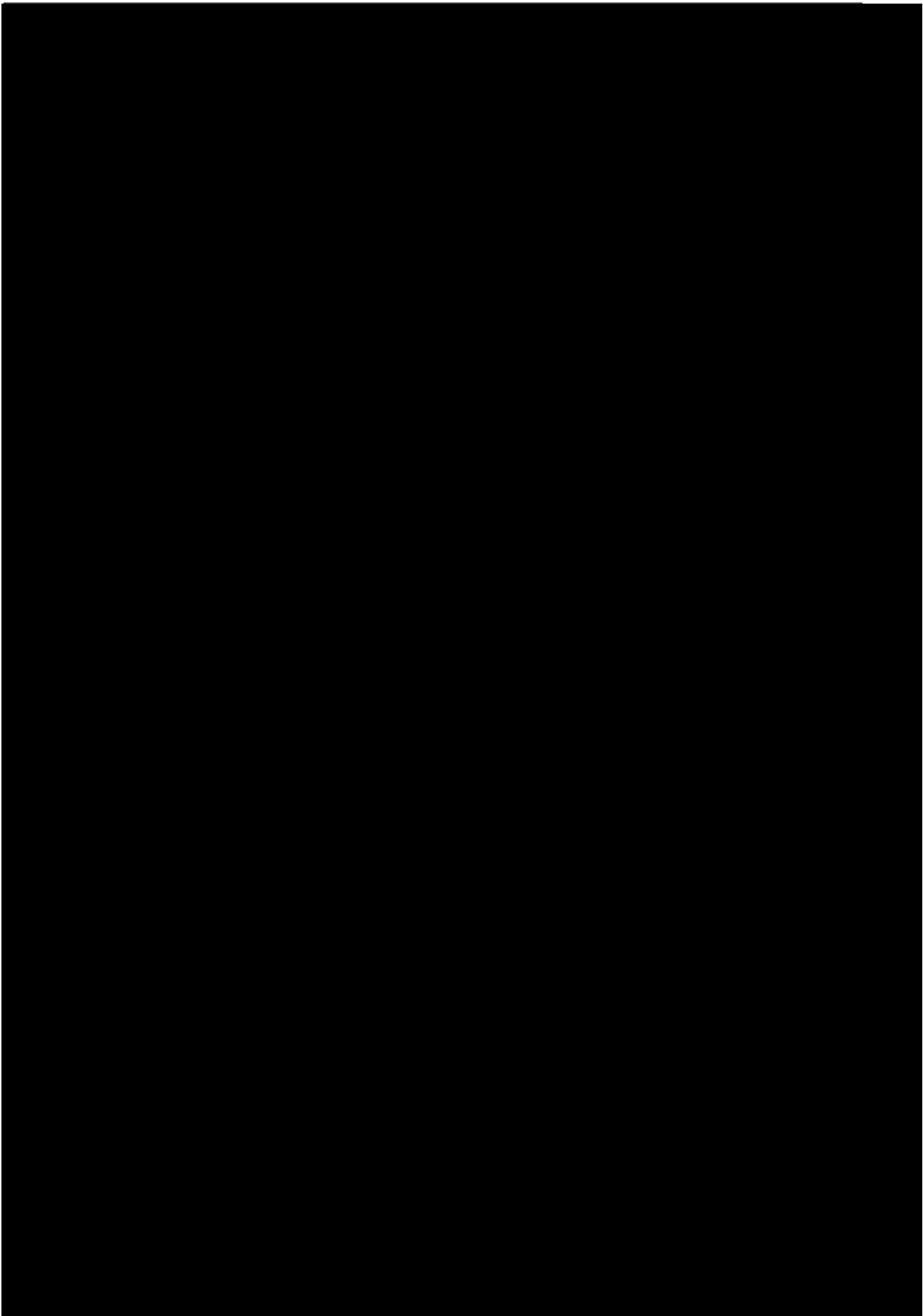
22 BRYAN BELTRAN, Videographer

23 JOSE LOPEZ, Kirkland Tech

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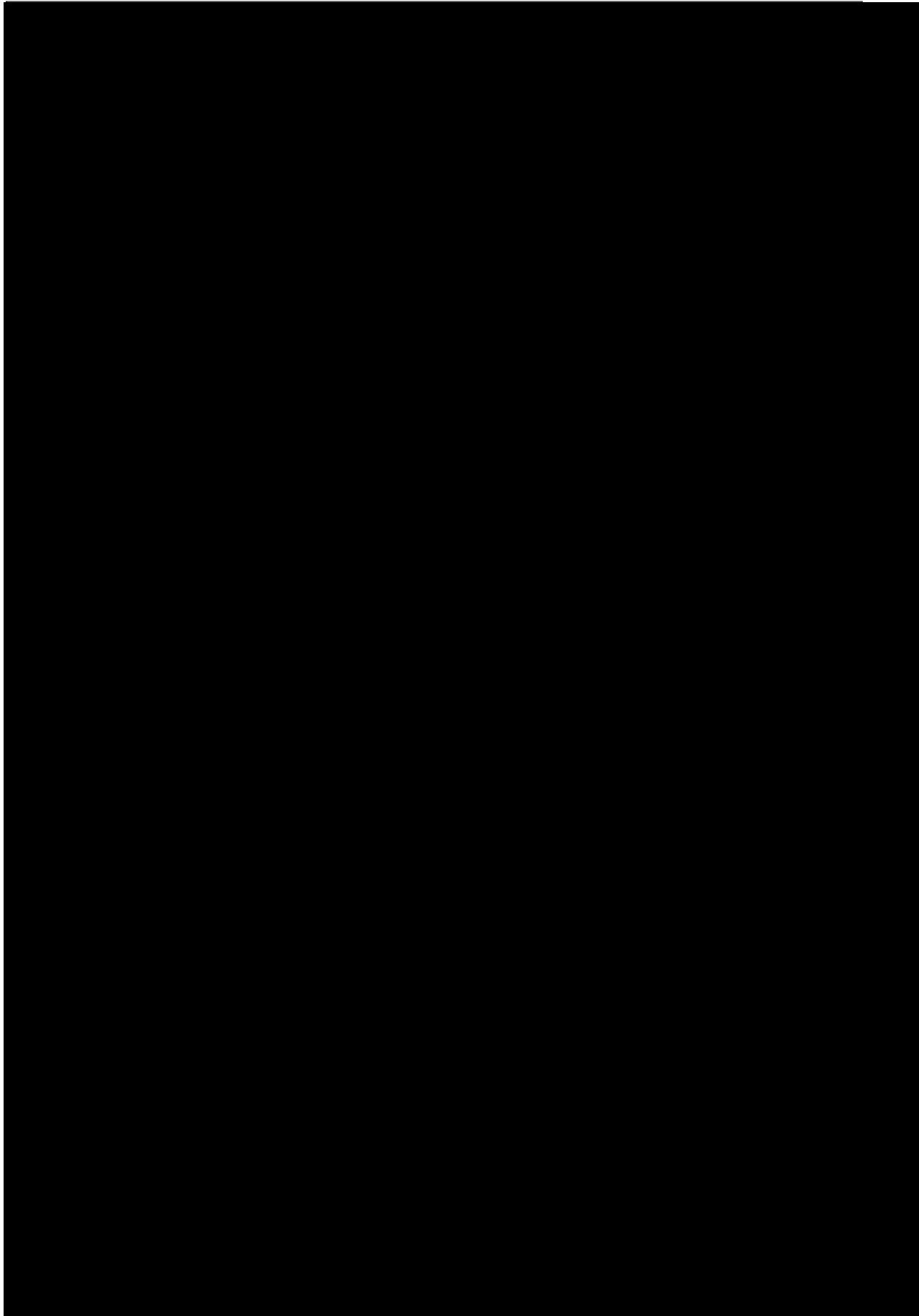
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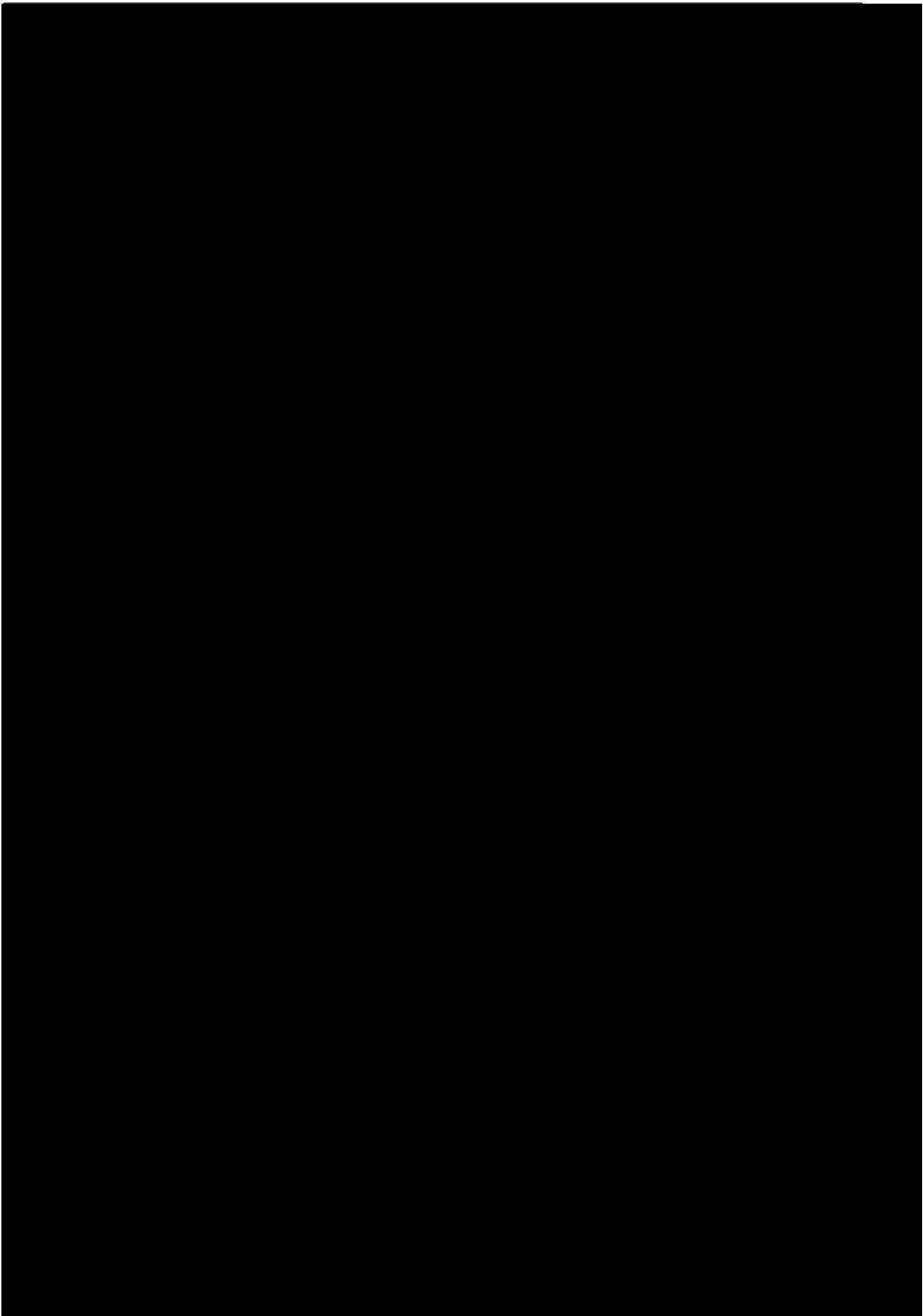


EXHIBIT 13

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
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FOR THE DISTRICT OF DELAWARE

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH and WEST PUBLISHING
6 CORPORATION,

7 Plaintiffs/Counterdefendants,

8 v. C.A. No. 20-613-SB

9 ROSS INTELLIGENCE INC.,

10 Defendant/Counterclaimant.

11 HIGHLY CONFIDENTIAL

12
13 VIDEOTAPED DEPOSITION OF MARK HOFFMAN

14
15 DATE: April 25, 2023

16 TIME: 9:02 a.m.

17 PLACE: Veritext

18 150 South Fifth Street, Suite 1775

19 Minneapolis, MN 55402

20
21 REPORTED BY:

22 Dawn Workman Bounds, CSR

23 JOB NO.: SF 5871236

24
25 PAGES 1 - 167

HIGHLY CONFIDENTIAL

1 A P P E A R A N C E S
2

3 ON BEHALF OF PLAINTIFFS/COUNTERDEFENDANTS:

4 CHRISTA C. COTTRELL, ESQ.

5 Kirkland & Ellis LLP

6 300 North LaSalle

7 Chicago, IL 60654

8 christa.cottrell@kirkland.com

9 312-862-7075

10

11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 WARRINGTON S. PARKER, ESQ.

13 CRINESHA BERRY, ESQ.

14 Crowell & Moring LLP

15 3 Embarcadero Center, 26th Floor

16 San Francisco, CA 94111

17 wparker@crowell.com

18 cberry@crowell.com

19 202-624-2500

20

21 ALSO PRESENT:

22 Kyle Peterson, Videographer

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EXHIBIT 14

1 DEPOSITION OF THOMAS LEIGHTON

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH and WEST
6 PUBLISHING CORPORATION,

7 Plaintiffs and
Counterdefendants,

8 vs. C.A. No.
9 ROSS INTELLIGENCE INC., 20-613 (LPS)

10 Defendant and
Counterclaimant.

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14 HIGHLY CONFIDENTIAL
15 PURSUANT TO THE PROTECTIVE ORDER

16 VIDEOTAPED DEPOSITION OF THOMAS LEIGHTON

17 MINNEAPOLIS, MINNESOTA

18 April 5, 2022

19
20
21 Reported by:

22
23 KELLY A. HERRICK

24 JOB NO. 208927

25

1 DEPOSITION OF THOMAS LEIGHTON

2

3 April 5, 2022

4 9:06 a.m.

5

6

7 Videotaped deposition of THOMAS LEIGHTON,
8 held at the offices of Regus, 100 S. Fifth
9 Street, Suite 1900, Minneapolis, Minnesota,
10 before Kelly A. Herrick, a Notary Public of
11 the State of Minnesota.

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1 DEPOSITION OF THOMAS LEIGHTON

2 A P P E A R A N C E S:

3

4 KIRKLAND & ELLIS LLP

5 Attorneys for Plaintiff

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: MIRANDA MEANS, ESQUIRE

9 JENNIFER GIBBINS, ESQUIRE

10

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18 CROWELL & MORING LLP

19 3 Embarcadero Center

20 San Francisco, California 94111

21 BY: JOACHIM STEINBERG, ESQUIRE

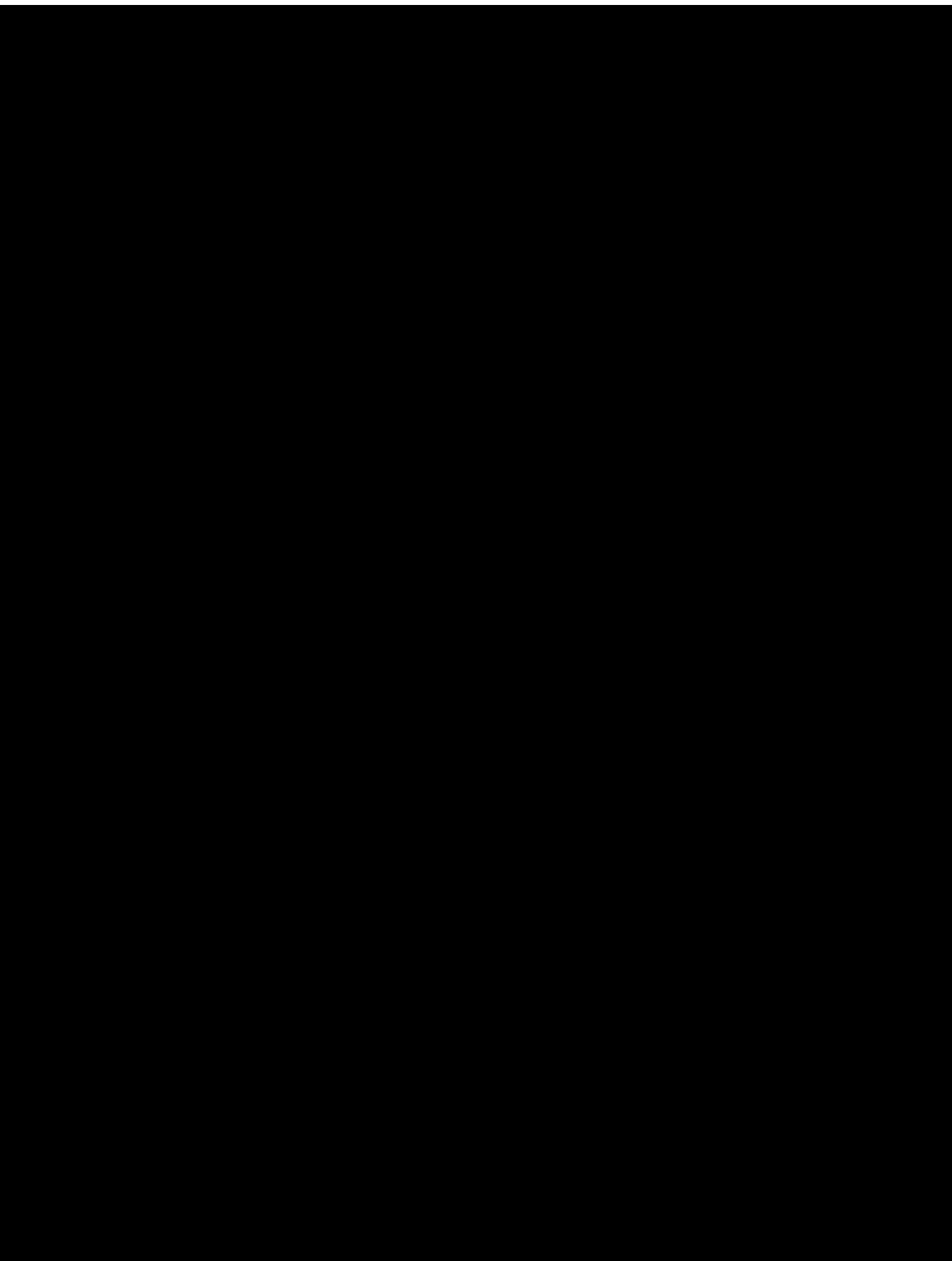
22 DIANE AGUIRRE-DOMINGUEZ, ESQUIRE

23

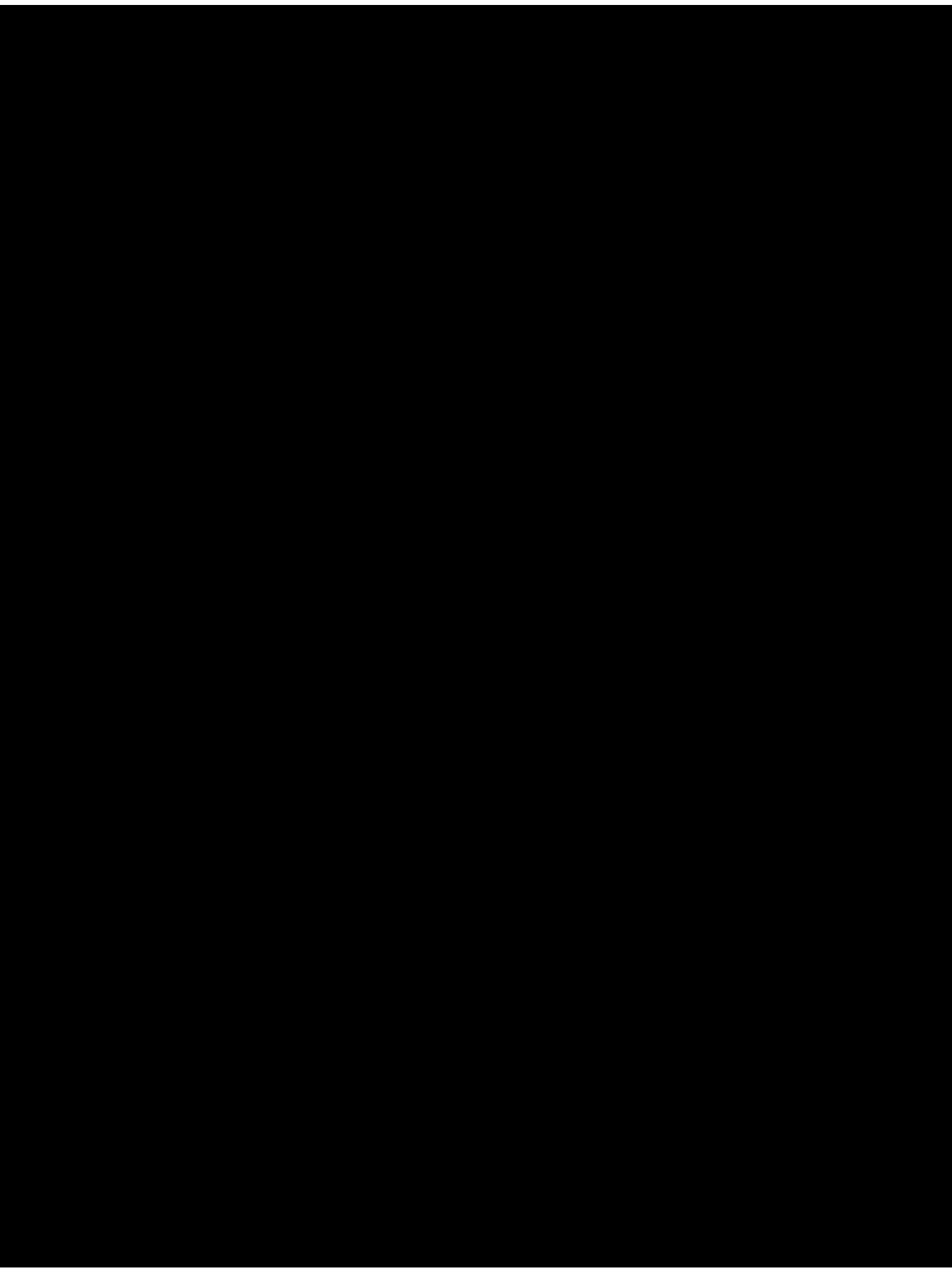
24 ALSO PRESENT:

25 Jacob Arvold, Videographer

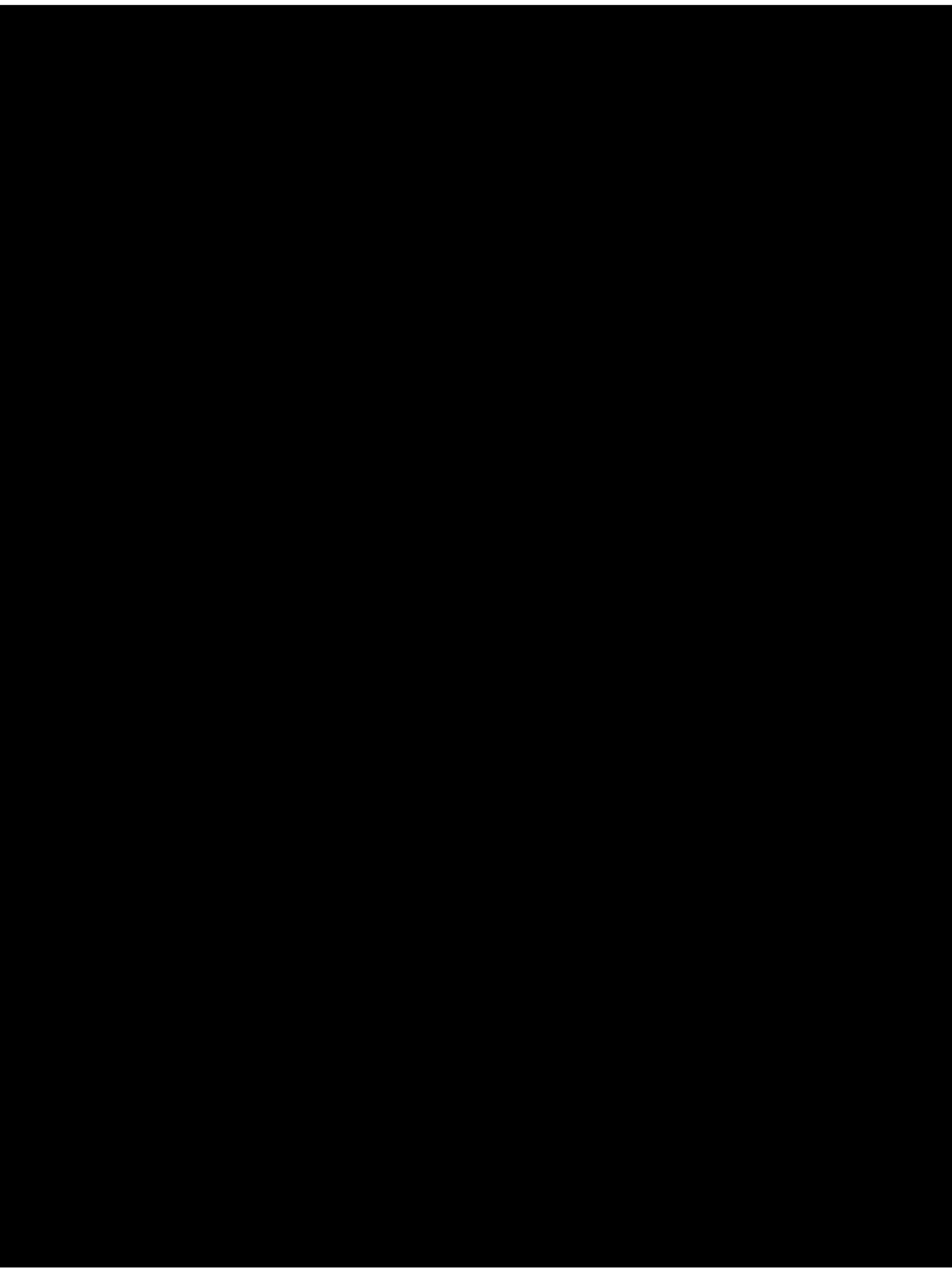
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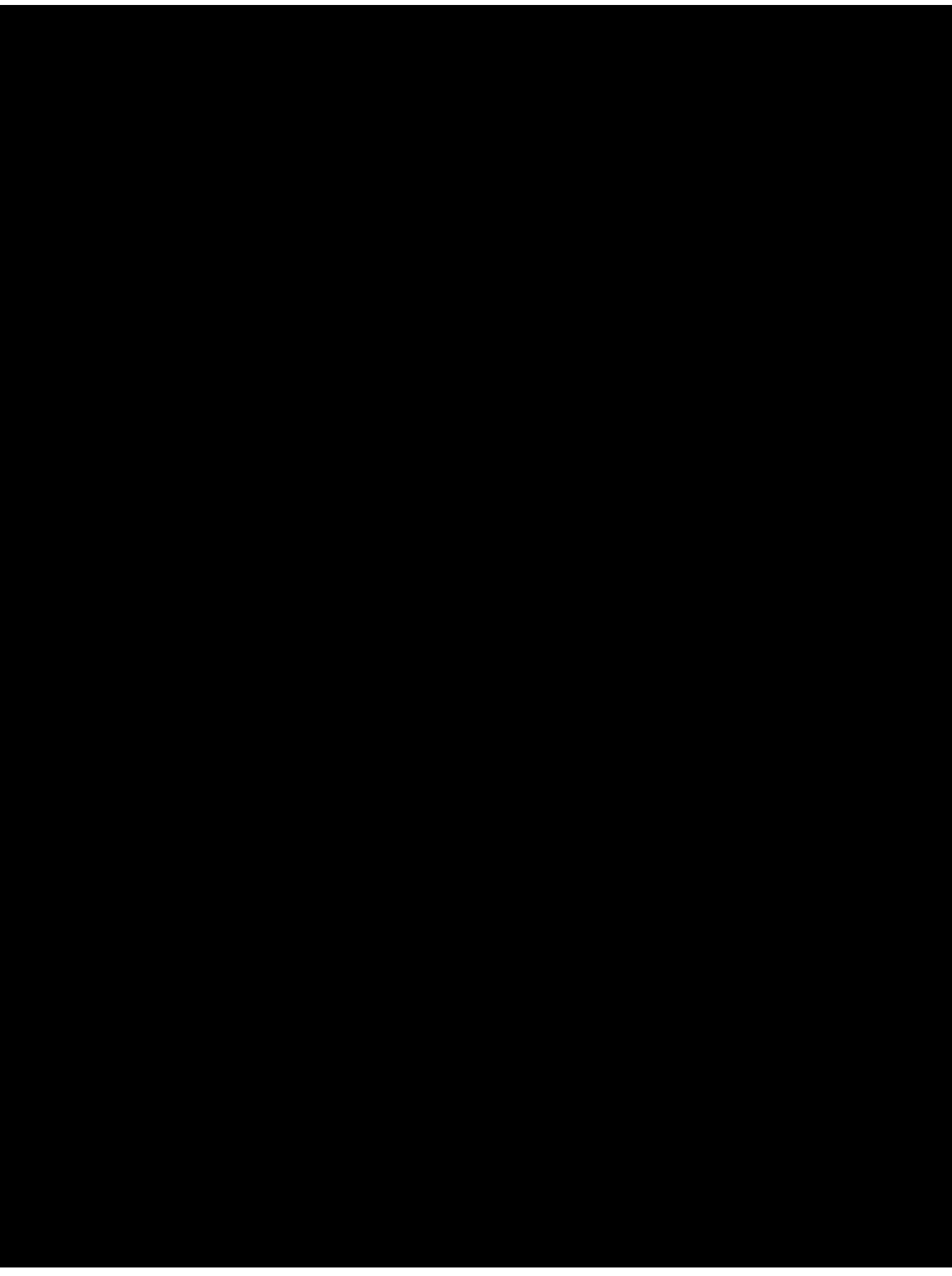
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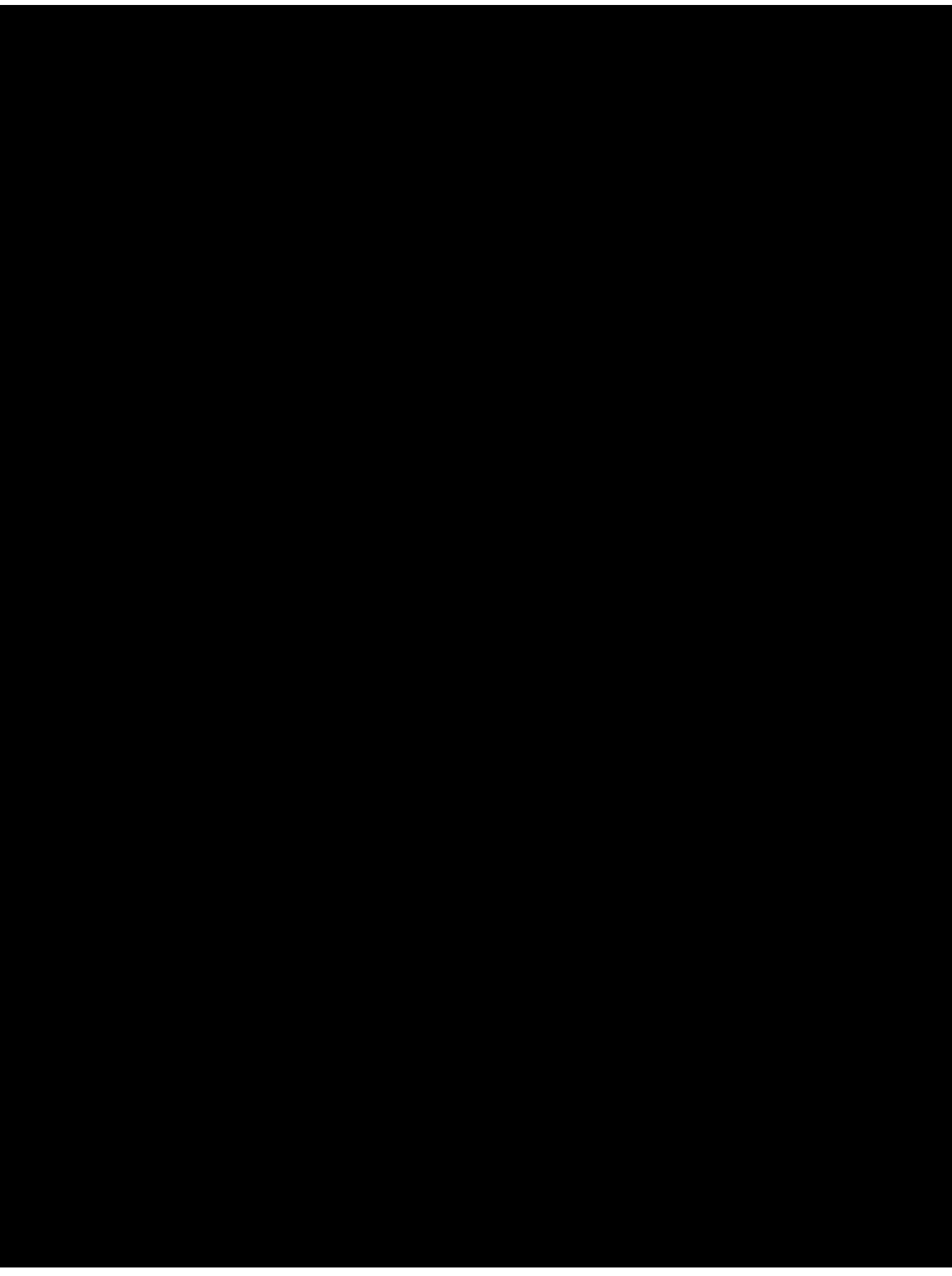
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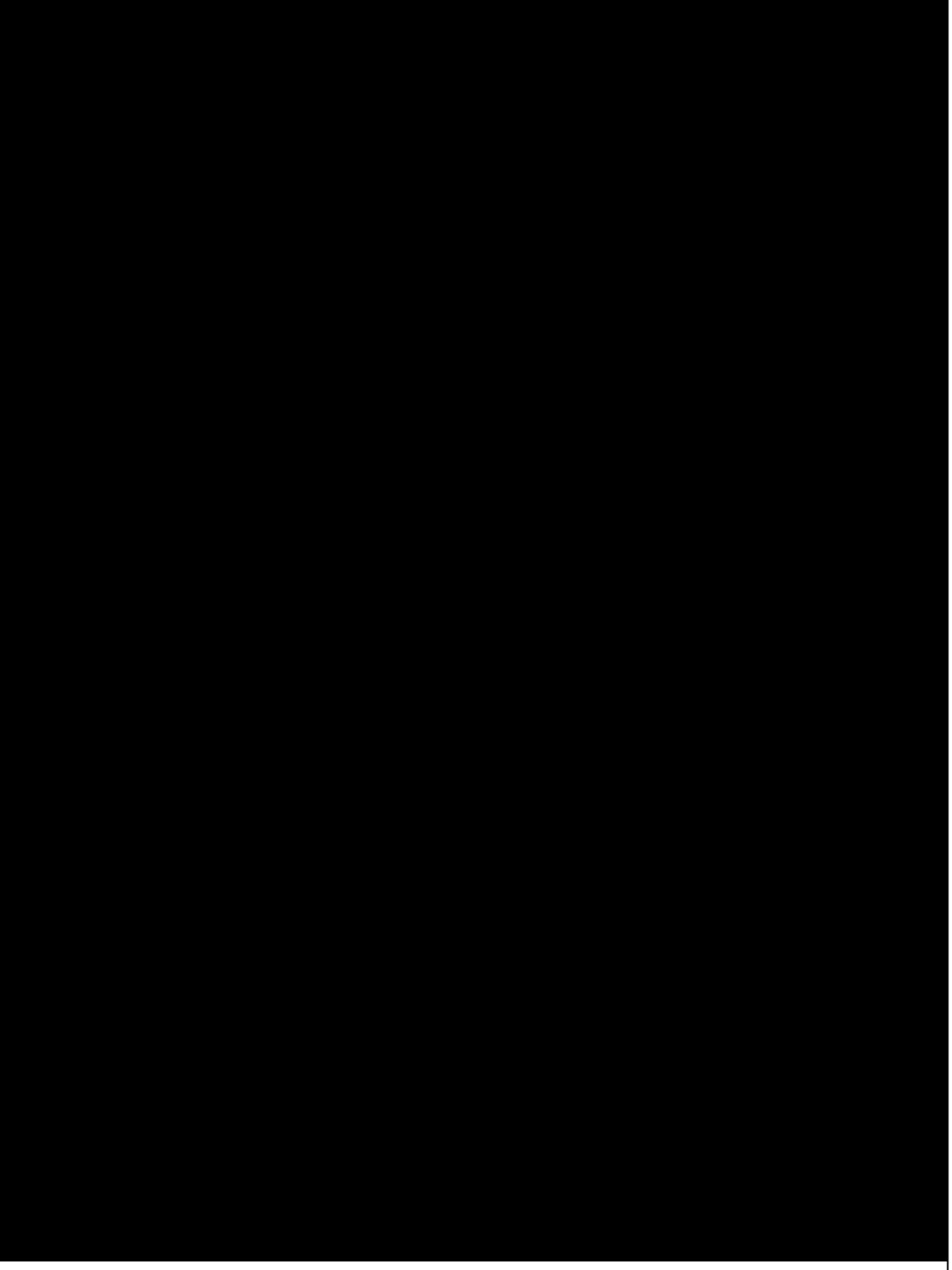
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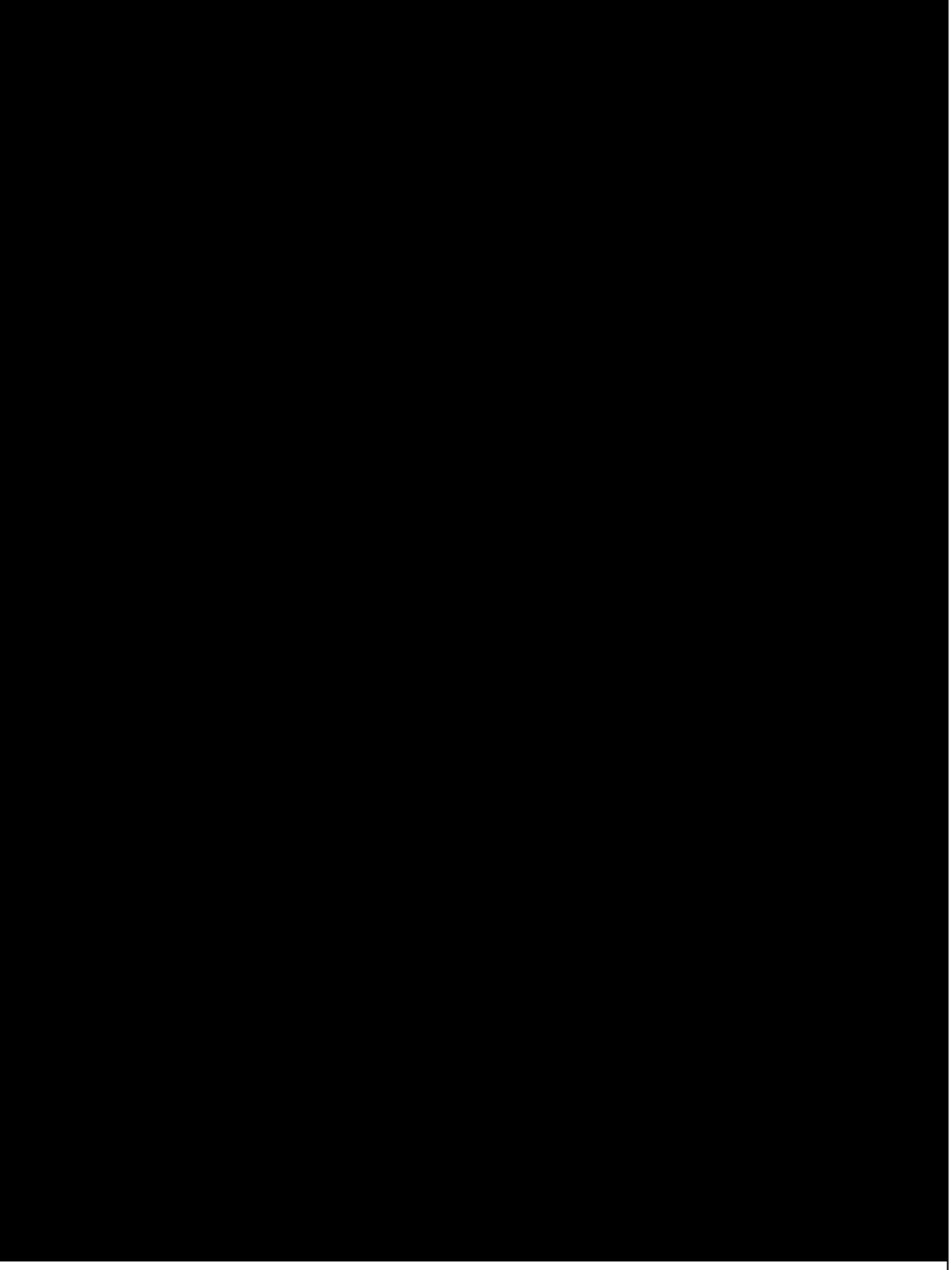
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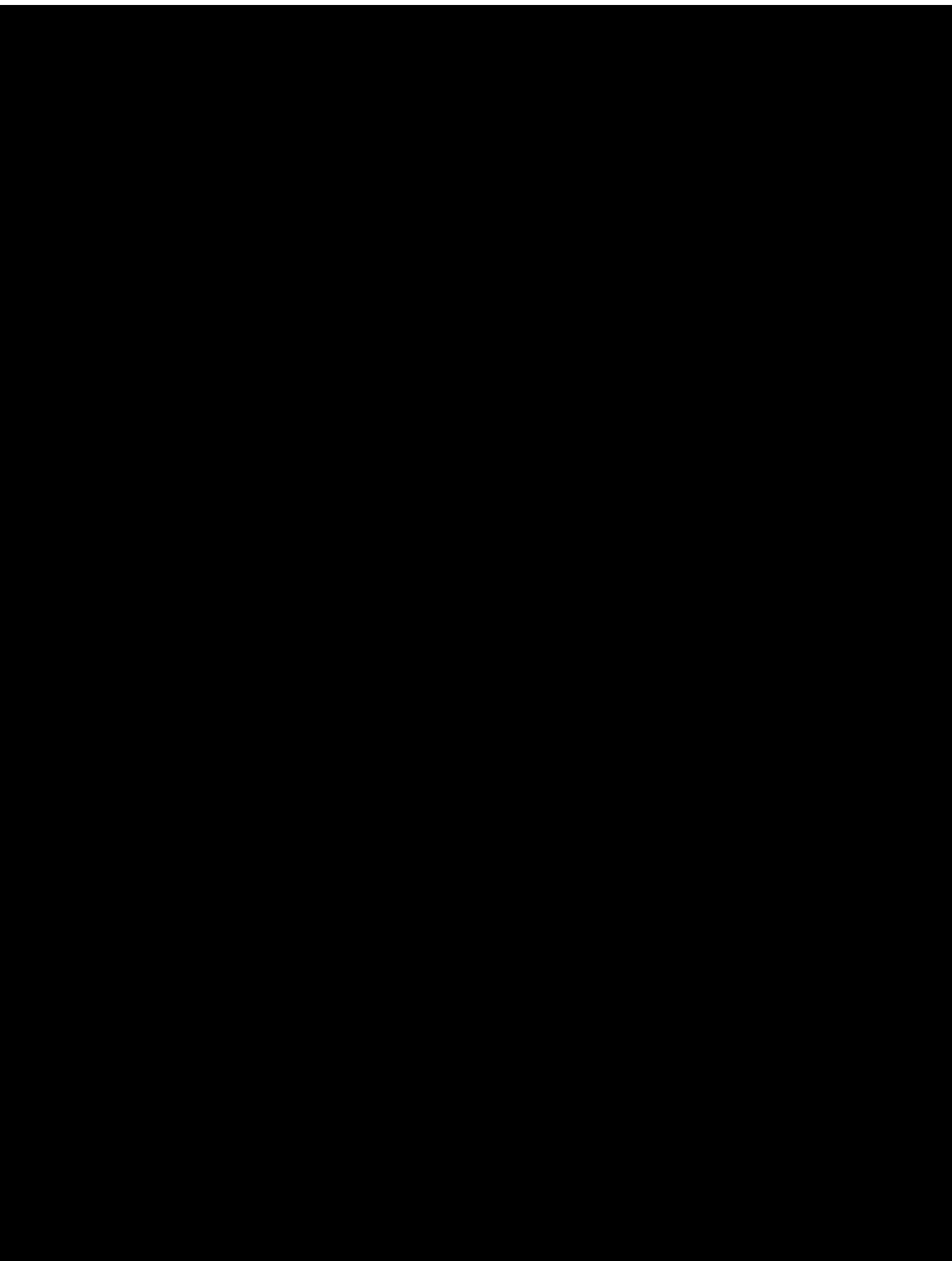
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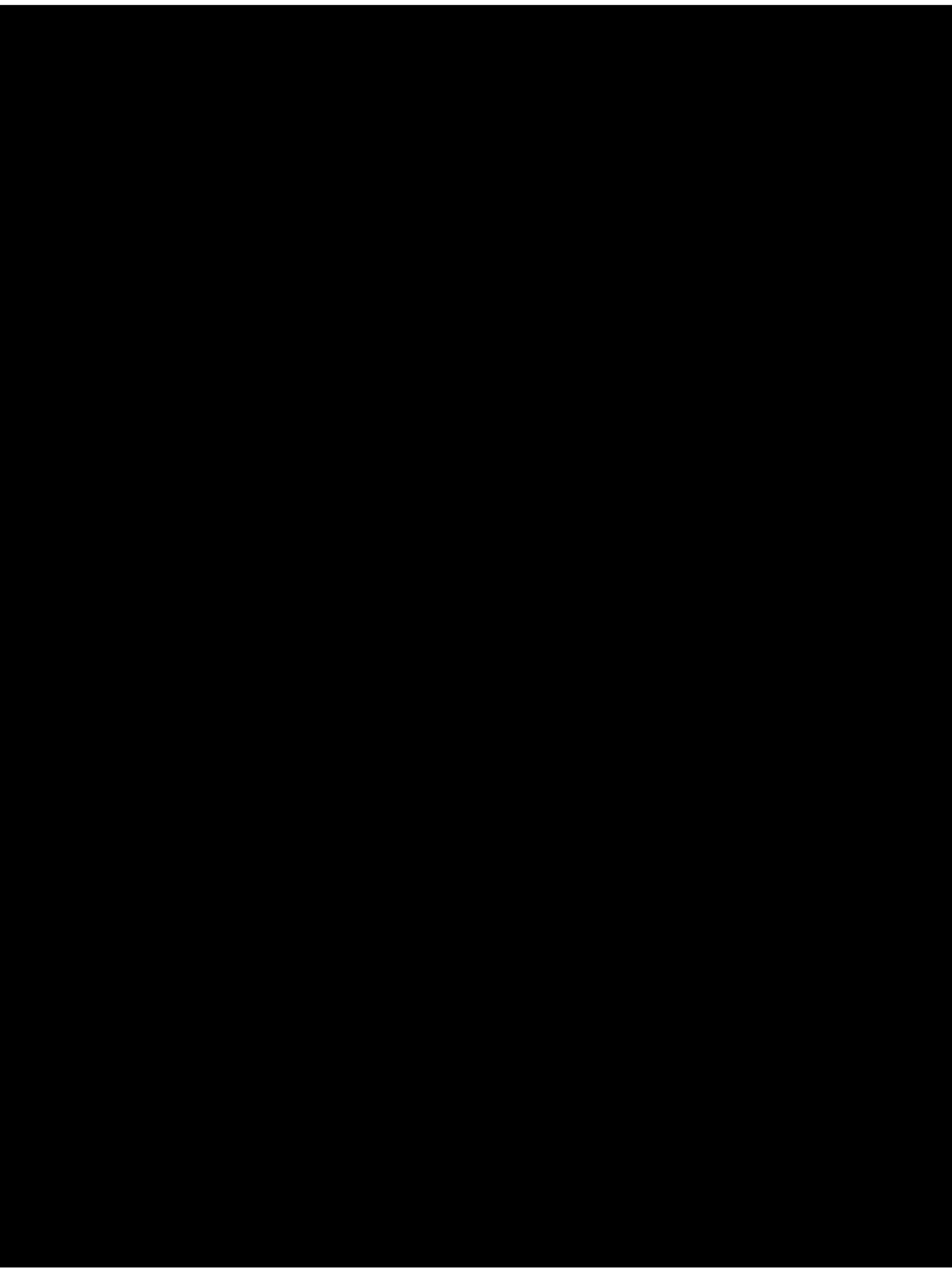
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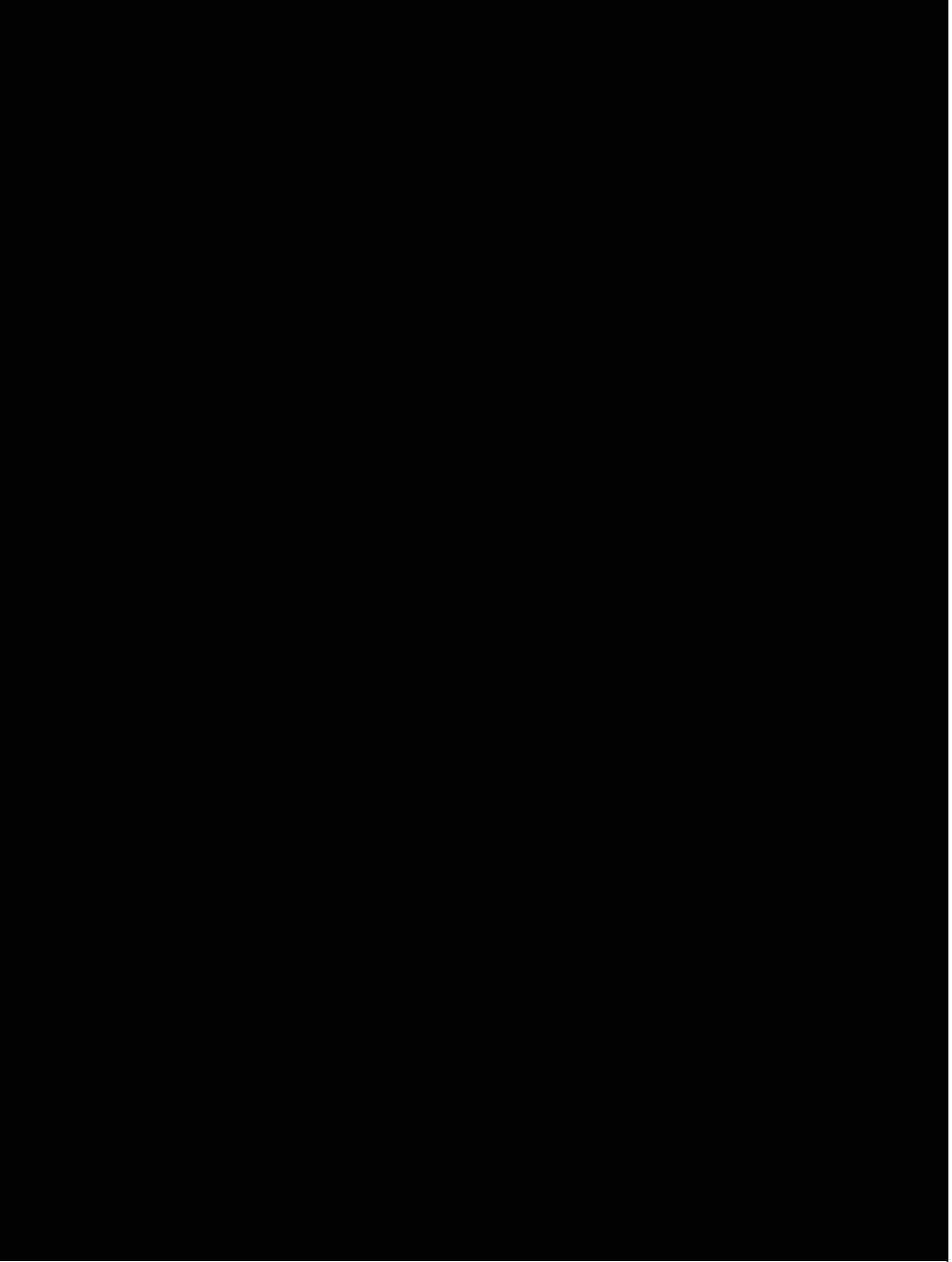
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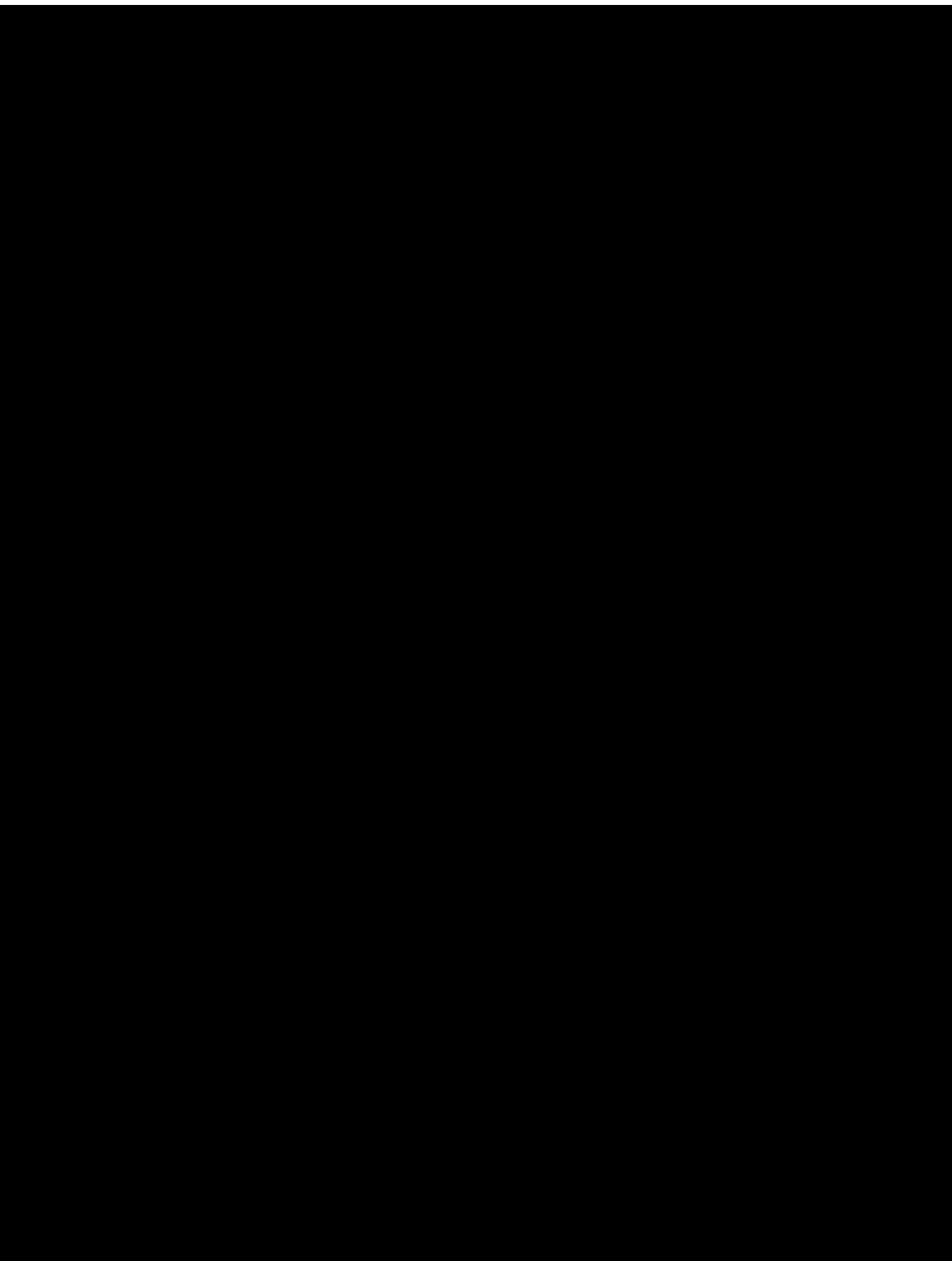
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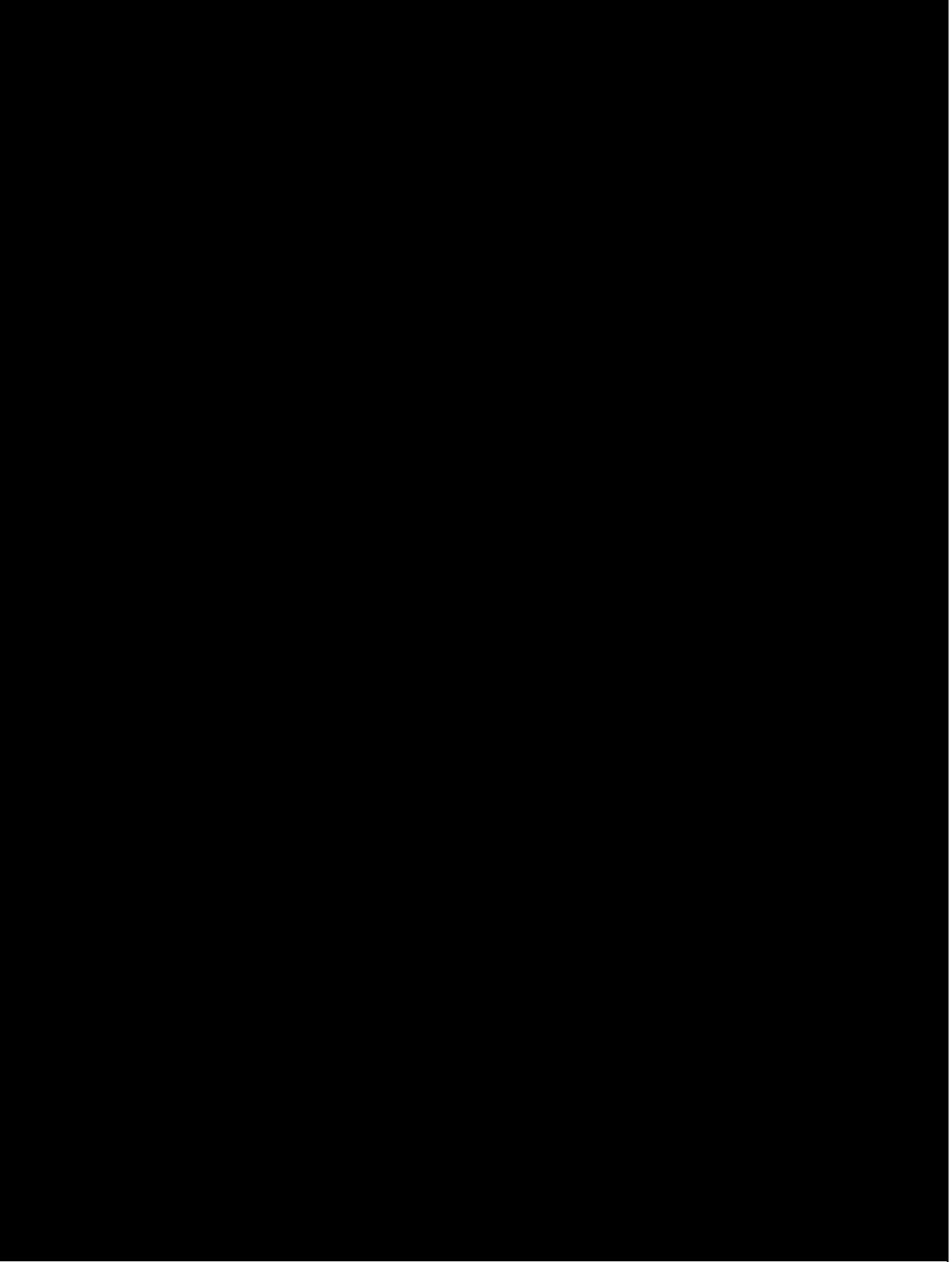
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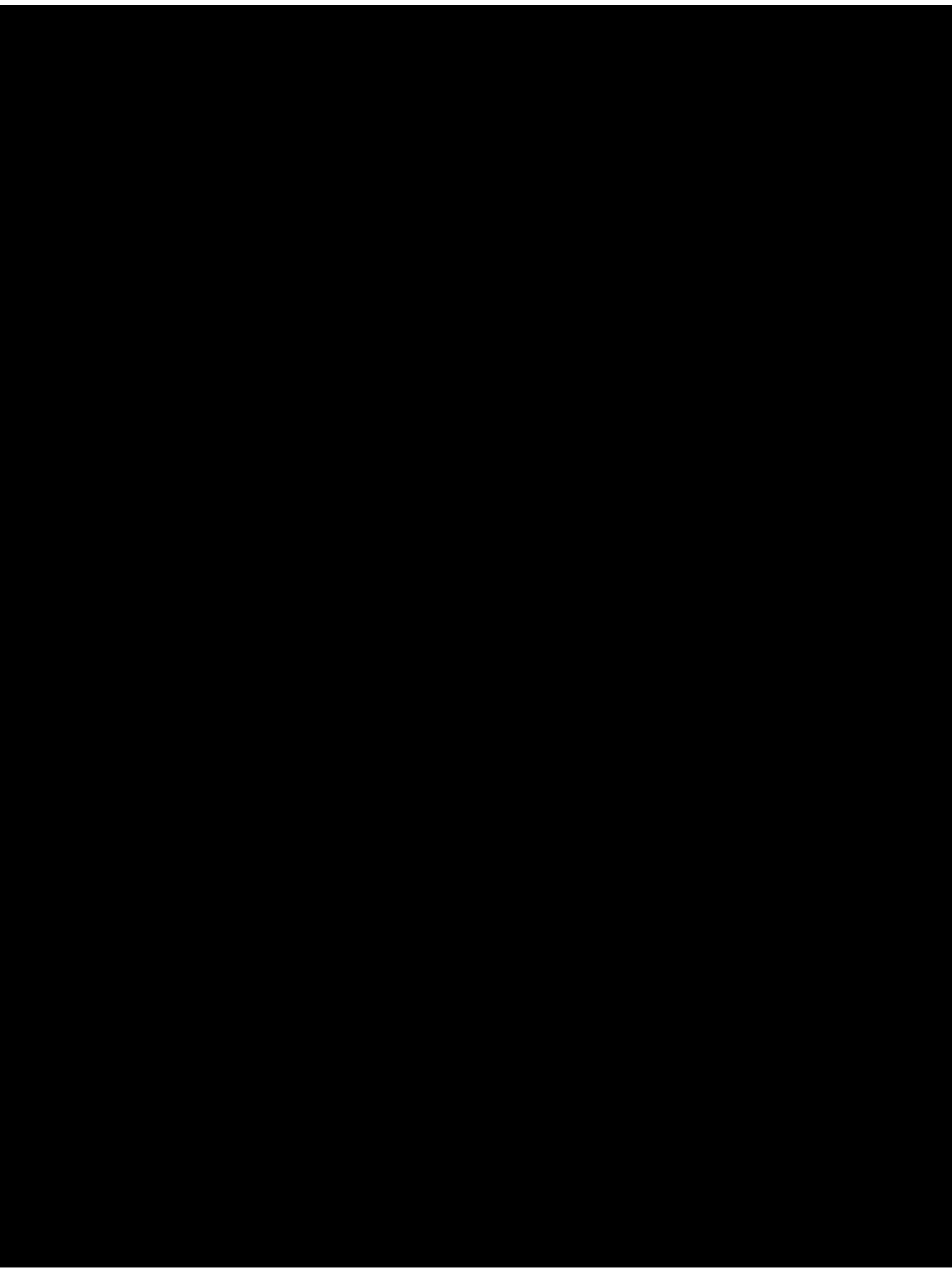
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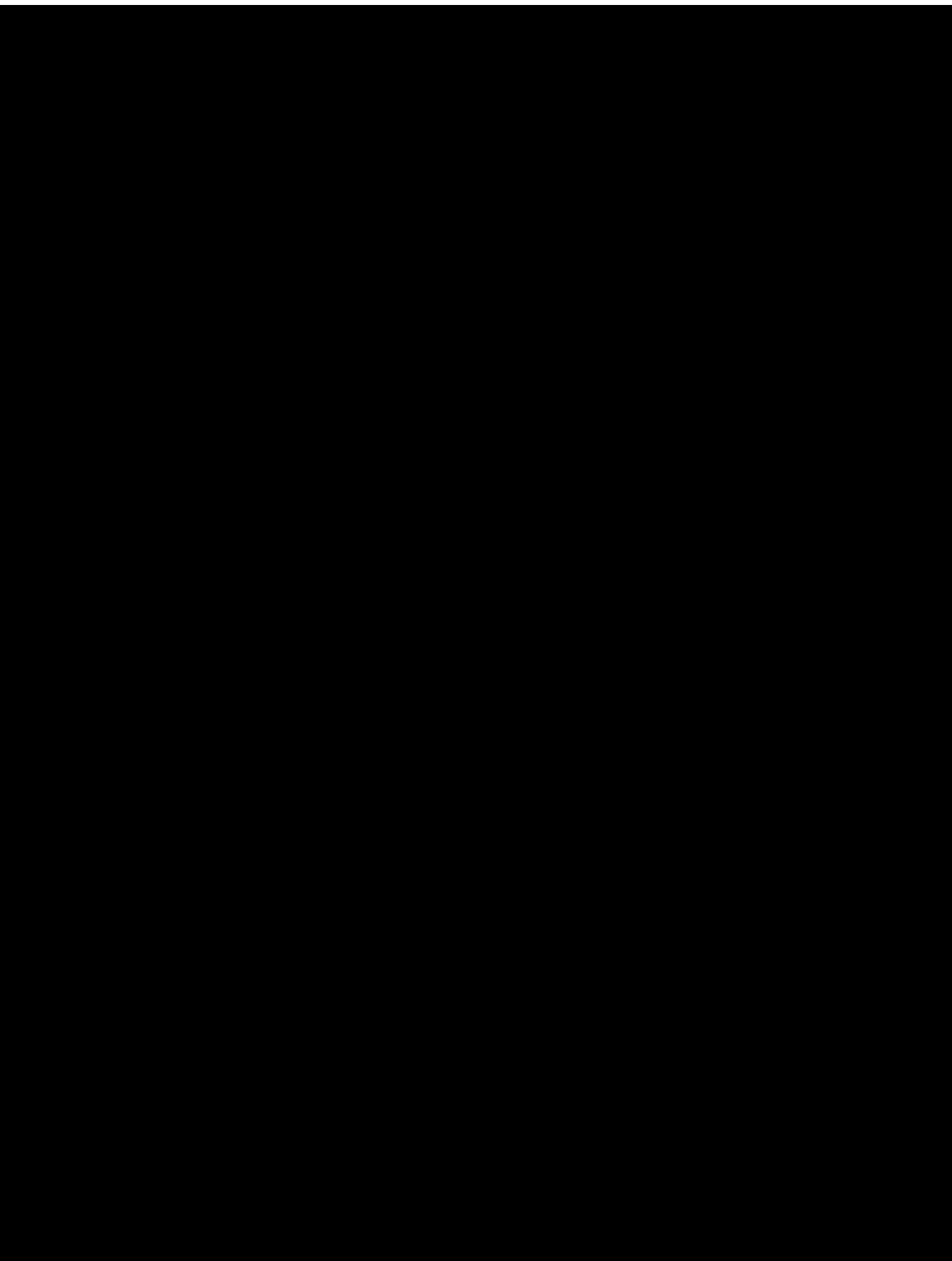


EXHIBIT 15

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 _____
4 Thomson Reuters)
5 Enterprise Centre GmbH and)
6 West Publishing)
7 Corporation,)
8)
9 Plaintiffs,)
10)
11 vs.) C.A. No. 20-613-SB
12)
13 ROSS Intelligence Inc.,)
14)
15 Defendant.)
16 _____

17 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
18 Videotaped 30(b)(6) Deposition of
19 WEST PUBLISHING CORPORATION

20 by and through their corporate representative
21 THOMAS LEIGHTON

22 Monday, April 24, 2023

23 8:58 a.m. to 2:23 p.m.

24 Pages 1 to 179

25 LOCATION

Paradigm, a Veritext Company

Fifth Street Towers

150 South 5th Street, Suite 1775

Minneapolis, Minnesota 55402

JOB NO.: SF 5871226

REPORTED BY: Merilee Johnson, RDR, CRR, CRC, RSA

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 A P P E A R A N C E S
23 ON BEHALF OF THOMSON REUTERS ENTERPRISE CENTRE GmbH
and WEST PUBLISHING CORPORATION:
45 KIRKLAND & ELLIS LLP
6BY: Vanessa Barsanti, Esq.
300 North LaSalle
Chicago, Illinois 60654
Phone: (312) 862-2000
Email: Vanessa.Barsanti@Kirkland.com
7
8ON BEHALF OF ROSS INTELLIGENCE, INC.:
910 CROWELL & MORING LLP
BY: Joachim B. Steinberg, Esq.590 Madison Avenue
20th Floor
New York, New York 10022
Phone: (212) 223-4000
Email: JSteinberg@Crowell.com
11
12
13- and -
14CROWELL & MORING LLP
15 BY: Dalton Hughes, Esq.455 North Cityfront Plaza Drive
Suite 3600
Chicago, Illinois 60611
Phone: (312) 321-4200
Email: DHughes@Crowell.com
16
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19ALSO APPEARED:
20Dave Young, Videographer
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EXHIBIT 16

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE DISTRICT OF DELAWARE
4

5 THOMSON REUTERS ENTERPRISE
6 CENTRE GMBH and WEST PUBLISHING
7 CORPORATION,

8 Plaintiffs/Counterdefendants,
9 v.
10 ROSS INTELLIGENCE INC.,
11 Defendant/Counterclaimant.

12 VIDEOTAPED DEPOSITION OF
13

14 ERIK LINDBERG
15 INDIVIDUALLY AND AS A 30(B) (6) REPRESENTATIVE
16 FOR THOMSON REUTERS ENTERPRISE CENTRE GMBH
17 HIGHLY CONFIDENTIAL

18 DATE: April 24, 2023
19 TIME: 8:56 a.m.
20 PLACE: Veritext
21 150 South Fifth Street, Suite 1775
22 Minneapolis, MN 55402
23
24 JOB NO.: 5874479
25 REPORTED BY: Dawn Workman Bounds, CSR

A P P E A R A N C E S
ON BEHALF OF PLAINTIFFS/COUNTERDEFENDANTS:
CAMERON GINDER, ESQ.
Kirkland & Ellis LLP
300 North LaSalle
Chicago IL 60654
cameron.ginder@kirkland.com
312-862-7075

ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

CRINESHA BERRY, ESQ.
Crowell & Moring LLP
3 Embarcadero Center 26th Floor
San Francisco CA 94111
cberry@crowell.com
202-624-2500

and

ANNA SABER, ESQ.
Crowell & Moring LLP
1001 Pennsylvania Ave NW
Washington DC 20004
asaber@crowell.com
202-624-2500

ALSO PRESENT:

Kyle Peterson, Videographer

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EXHIBIT 17

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 _____
4 Thomson Reuters Enterprise)
5 Centre GmbH and West)
6 Publishing Corporation,)
7 Plaintiffs,)
8 vs.) C.A. No. 20-613-SB
9 ROSS Intelligence, Inc.,)
Defendant.)
10 _____

11 HIGHLY CONFIDENTIAL - AEO
12 REMOTE VIDEOTAPEDE DEPOSITION OF
13 ANDREW MARTENS
14

15 Friday, May 5, 2023
16 8:57 a.m. to 3:23 p.m.
17 Pages 1 to 246
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24 JOB NO.: SF 5871254
25 REPORTED BY: Merilee Johnson, RDR, CRR, CRC, RSA

A P P E A R A N C E S
(All appearing remotely via videoconference)

ON BEHALF OF THOMSON REUTERS ENTERPRISE CENTRE GmbH
and WEST PUBLISHING CORPORATION:

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BY: Daniel E. Laytin, Esq.
300 North LaSalle
Chicago, Illinois 60654
Phone: (312) 862-2000
Email: Daniel.Laytin@Kirkland.com

ON BEHALF OF ROSS INTELLIGENCE, INC.:
[REDACTED]

CROWELL & MORING LLP
BY: Gabriel M. Ramsey, Esq.
Margaux Poueymirou, Esq.
3 Embarcadero Center
26th Floor
San Francisco, California 94111
Phone: (415) 986-2800
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ALSO APPEARED:

Anne Barnard, Thomson Reuters
Dave Young, Videographer

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EXHIBIT 18

1

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 ** HIGHLY CONFIDENTIAL **

16 ** ATTORNEYS' EYES ONLY **

17 REMOTE VIDEOTAPED DEPOSITION OF

18 PETER MARTIN, J.D.

19 Thursday, August 3, 2023

20 8:59 a.m. (CST)

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23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-905291

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4 August 3, 2023

5 8:59 a.m. (CST)

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9 Highly Confidential Videotaped

10 Deposition of PETER MARTIN, J.D., held
11 remotely via Zoom, before Joan Ferrara, a
12 Registered Merit Reporter, Federal
13 Certified Realtime Reporter and Notary
14 Public.

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11 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

12 CROWELL & MORING LLP

13 3 Embarcadero Center

14 26th Floor

15 San Francisco, California 94111

16 BY: JACOB CANTER, ESQ.

17 WARRINGTON PARKER, ESQ.

20 ALSO PRESENT:

21 ADRIAN BELTRAN, Videographer

22 JEREMY YOUNG, Kirkland Tech

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EXHIBIT 19

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE DISTRICT OF DELAWARE
4

5 THOMSON REUTERS ENTERPRISE
6 CENTRE GMBH and WEST PUBLISHING
7 CORPORATION,

8 Plaintiffs/Counterdefendants,
9 v.
10 ROSS INTELLIGENCE INC.,
11 Defendant/Counterclaimant.

12
13 VIDEOTAPED DEPOSITION OF
14

15 LAURIE OLIVER
16 HIGHLY CONFIDENTIAL
17

18
19 DATE: April 28, 2023
20 TIME: 8:57 a.m.
21 PLACE: Veritext
22 150 South Fifth Street, Suite 1775
23 Minneapolis, MN 55402
24 JOB NO.: SF 5871246
25 REPORTED BY: Dawn Workman Bounds, CSR

A P P E A R A N C E S
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and

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Washington DC 20004
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Kyle Peterson, Videographer

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EXHIBIT 20

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3

4 _____

5 THOMSON REUTERS ENTERPRISE)

6 CENTRE GMBH and WEST)

7 PUBLISHING CORPORATION,)

8 Plaintiffs and) C.A. No. 20-613

9 Counterdefendants) (LPS)

10 v.)

11 ROSS INTELLIGENCE, INC.,) HIGHLY CONFIDENTIAL

12 Defendant and)

13 Counterclaimant.)

14 _____)

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17 --- This is the transcript of the videotaped

18 Deposition of, JIMOH OVBIAGELE, taken at the

19 offices of Regus - Toronto Airport Corporate

20 Centre, Mississauga, Ontario, Canada, on the

21 12th day of April, 2022.

22 -----

23

24 REPORTED BY: Helen Martineau, CSR

25 VIDEOGRAPHER: Bruno Silva

2

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9 Email: joshua.simmons@kirkland.com

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EXHIBIT 21

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

7 Plaintiffs and
8 Counter-Defendants,

9 vs.

10 ROSS INTELLIGENCE INC.,

11 Defendant and
Counterclaimant.

12 -----
13 ** HIGHLY CONFIDENTIAL **

14 ** ATTORNEYS' EYES ONLY **

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16 REMOTE VIDEOTAPED DEPOSITION OF

17 JIMOH OVBIAGELE

18
19 Tuesday, May 2, 2023

20 8:02 a.m. (CST)

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23 Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2023-892413

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4 May 2, 2023

5 8:02 a.m. (CST)

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9 Videotaped Deposition of JIMOH

10 OVBIAGELE, held remotely via Zoom, before
11 Joan Ferrara, a Registered Merit Reporter,
12 Federal Certified Realtime Reporter and
13 Notary Public.

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1 REMOTE APPEARANCES:

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5 KIRKLAND & ELLIS LLP

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14 26th Floor

15 San Francisco, California 94111

16 BY: WARRINGTON PARKER, ESQ.

19 ALSO PRESENT:

20 LARRY GRISBY, Videographer

21 JOSE LOPEZ, Kirkland Tech

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EXHIBIT 22

HIGHLY CONFIDENTIAL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 _____
4 Thomson Reuters Enterprise)
5 Centre GmbH and West)
6 Publishing Corporation,)
7 Plaintiffs,)
8 vs.) C.A. No. 20-613-SB
9 ROSS Intelligence Inc.,)
10 Defendant.)
11 _____

12 HIGHLY CONFIDENTIAL
13 REMOTE VIDEOTAPEDE DEPOSITION OF
14 CHRISTINE POST

15 Thursday, April 27, 2023

16 9:02 a.m. to 2:56 p.m.

17 Pages 1 to 224

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24 JOB NO.: SF 5871243
25 REPORTED BY: Merilee Johnson, RDR, CRR, CRC, RSA

HIGHLY CONFIDENTIAL

1 A P P E A R A N C E S
2 (All appearing remotely via videoconference)

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4 and WEST PUBLISHING CORPORATION:

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EXHIBIT 23

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2 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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4 THOMSON REUTERS ENTERPRISE CENTRE GMBH and
WEST PUBLISHING CORPORATION,

5 Plaintiffs,

6 v.

7 ROSS INTELLIGENCE INC.,

8 Defendant.

9 -----X
HIGHLY CONFIDENTIAL

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11 VIDEOTAPED DEPOSITION OF JIM RATLIFF

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15 DATE: July 28, 2023

16 TIME: 9:40 a.m. Central

17 PLACE: ***REMOTE***

18 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

19 JOB NO: 2023-905290

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3

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5 Attorneys for the Plaintiff
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8 BY: CHRISTA COTTRELL, ESQ.
9 LEXI WUNG, ESQ.

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12 CROWELL & MORING LLP
13 Attorneys for the Defendant
14 3 Embarcadero Center
15 San Francisco, California 94111
16 BY: MATT MCBURNEY, ESQ.
17 CRINESHA BERRY, ESQ.
18 BEATRICE NGUYEN, ESQ.

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ALSO PRESENT:

Roman Bielski, Kirkland

Joshua Clarke, Lexitas

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EXHIBIT 24

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 -----

16 ** HIGHLY CONFIDENTIAL **

17 ** ATTORNEYS' EYES ONLY **

18

19 REMOTE VIDEOTAPED DEPOSITION OF SEAN SHAFIK

20

21 Friday, April 28, 2023

22 11:00 a.m. (PST)

23

24 Reported By:

25 Joan Ferrara, RMR, FCRR

Job No. 2023-892411

26

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4 April 28, 2023

5 11:00 a.m. (PST)

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9 Videotaped Deposition of SEAN

10 SHAFIK, held remotely via Zoom, before Joan
11 Ferrara, a Registered Merit Reporter,
12 Federal Certified Realtime Reporter and
13 Notary Public.

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1 REMOTE APPEARANCES:

4 ON BEHALF OF PLAINTIFFS/COUNTER-DEFENDANTS:

5 KIRKLAND & ELLIS LLP

6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: CAMERON GINDER, ESQ.

9 LEXI WUNG, ESQ.

12 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

13 CROWELL & MORING LLP

14 3 Embarcadero Center

15 26th Floor

16 San Francisco, California 94111

17 BY: JOACHIM B. STEINBERG, ESQ.

18 MARIA SOKOVA, ESQ.

21 ALSO PRESENT:

22 BRYAN BELTRAN, Videographer

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EXHIBIT 25

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3 THOMSON REUTERS ENTERPRISE)
4 CENTRE GMBH and WEST)
5 PUBLISHING CORPORATION,)
6 Plaintiffs and)
7 Counterdefendants,)
8 vs.) C.A. No. 20-613 (LPS)
9 ROSS INTELLIGENCE, INC.,)
10 Defendant and)
11 Counterplaintiff.)
12 _____)

13 **HIGHLY CONFIDENTIAL**

14 VIDEOTAPED 30 (b) (6) DEPOSITION OF DEFENDANT,

15 by and through its corporate designee

16 TOMAS VAN DER HEIJDEN,

17 (also in his individual capacity)

18 London, England, United Kingdom

19 Thursday, March 17, 2022

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23 Pages: Pages 1 - 443

24 Reported stenographically by:

25 LEAH M. WILLERSDORF, RPR-CRR-FBIVR-ACR-QRR2-CLR

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3

4 Thursday, March 17, 2022

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6

09:29 a.m.

(Greenwich Mean Time)

7

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9 Videotaped 30(b) (6) deposition of Defendant, by
10 and through its corporate representative Tomas van der
11 Heijden, as well as in his individual capacity, held
12 at the offices of Kirkland & Ellis International LLP,
13 30 St. Mary Axe, London EC3A 8AF, England, United
14 Kingdom, before Leah Willersdorf, Registered
15 Professional Reporter and Certified Realtime Reporter
16 with the US National Court Reporters Association,
17 and Accredited Court Reporter, Qualified Realtime
18 Reporter (Level 2) and Fellow of the British Institute
19 of Verbatim Reporters, and Certified LiveNote
20 Reporter.

21

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3

1 A P P E A R A N C E S
2

3 On behalf of Plaintiffs and Counterdefendants:

4 KIRKLAND & ELLIS, LLP

5 601 Lexington Avenue
6 New York, New York 10022
6 (212) 446 48007 BY: JOSHUA L. SIMMONS, ESQ.
8 JENNIFER GIBBINS, ESQ.
8 joshua.simmons@kirkland.com
9 jennifer.gibbins@kirkland.com

10 On behalf of Defendant and Counterplaintiff:

11 CROWELL & MORING, LLP

12 3 Embarcadero Center
13 26th Floor
13 San Francisco, CA 94111
14 (415) 986 280015 BY: KAYVAN M. GHAFFARI, ESQ.
16 kghaffari@crowell.com

17 ALSO PRESENT:

19 Linda Fleet - Videographer

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EXHIBIT 26

1

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF DELAWARE
4 Case No. 20-613 (LPS)

5 IN RE MATTER OF:

6 THOMSON REUTERS ENTERPRISE
7 CENTRE GMBH and WEST
8 PUBLISHING CORPORATION,

9 Plaintiffs and
10 Counter-Defendants,

11 vs.

12 ROSS INTELLIGENCE INC.,

13 Defendant and
14 Counterclaimant.

15 -----
16

17 ** HIGHLY CONFIDENTIAL **

18 ** ATTORNEYS' EYES ONLY **

19

20 REMOTE VIDEOTAPED DEPOSITION OF

21 TOMAS VAN DER HEIJDEN

22

23 Tuesday, May 9, 2023

24 1:02 p.m.

25

Reported By:

26 Joan Ferrara, RMR, FCRR

27 Job No. 2023-892417

2

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3

4 May 9, 2023

5 1:02 p.m.

6

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8

9 Videotaped Deposition of TOMAS
10 VAN DER HEIJDEN, held remotely via Zoom,
11 before Joan Ferrara, a Registered Merit
12 Reporter, Federal Certified Realtime
13 Reporter and Notary Public.

14

15

16

17

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3

1 REMOTE APPEARANCES:

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6 200 Clarendon Street

7 Boston, Massachusetts 02116

8 BY: CAMERON GINDER, ESQ.

12 ON BEHALF OF DEFENDANT/COUNTERCLAIMANT:

13 CROWELL & MORING LLP

14 3 Embarcadero Center

15 26th Floor

16 San Francisco, California 94111

17 BY: JOACHIM B. STEINBERG, ESQ.

18 JACOB CANTER, ESQ.

21 ALSO PRESENT:

22 BRYAN BELTRAN, Videographer

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EXHIBIT 27

1

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3
4 THOMSON REUTERS ENTERPRISE
CENTRE GMBH AND WEST
5 PUBLISHING CORPORATION,

6 PLAINTIFFS AND
COUNTERDEFENDANTS ,

7 vs. No. 20-613 (LPS)

8 ROSS INTELLIGENCE INC. ,

9 DEFENDANT AND
10 COUNTERCLAIMANT .

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14 VIDEOTAPED DEPOSITION OF

15 EDWARD WALTERS

16 HIGHLY CONFIDENTIAL

17 Tuesday, March 1, 2022

18 REPORTED REMOTELY VIA ZOOM

19
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21
22 Reported By:

23 KATHLEEN MALTBIE, STENOGRAPHIC REPORTER, CSR 10068

24 RPR-RMR-CRR-CCRR-CLR-CRC (Via Zoom Videoconference)

2

1 VIDEOTAPED DEPOSITION OF EDWARD WALTERS

2 BE IT REMEMBERED that on Tuesday, March 1,
3 2022, commencing at the hour of 9:14 a.m. thereof,
4 before me, Kathleen A. Maltbie,
5 RPR-RMR-CRR-CCRR-CLR-CRC, a Certified Stenographic
6 Shorthand Reporter, in and for the State of
7 California, personally appeared EDWARD WALTERS,
8 remotely via Zoom videoconference, a witness in the
9 above-entitled court and cause, who, being by me
10 first remotely duly sworn, was thereupon examined as
11 a witness in said action.

12

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1 APPEARANCES OF COUNSEL

2 FOR THE PLAINTIFFS AND COUNTERDEFENDANTS:

3 (Via Zoom Videoconference)
4 KIRKLAND & ELLIS LLP
5 200 Clarendon Street
6 Boston, Massachusetts 02116
7 BY: MIRANDA MEANS, ESQ.
8 Telephone: (617) 385-7419
9 Email: Miranda.means@kirkland.com

10 KIRKLAND & ELLIS LLP
11 601 Lexington Avenue
12 New York, New York 10022
13 BY: JOSHUA L. SIMMONS, ESQ.
14 ERIC A. LOVERRO, ESQ.
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16 Telephone: (212) 446-4800
17 Email: Joshua.simmons@kirkland.com
Eric.loverro@kirkland.com
jennifer.gibbins@kirkland.com

18 FOR THE DEFENDANT AND COUNTERCLAIMANT:

19 (Via Zoom Videoconference)
20 CROWELL & MORING LLP
21 Three Embarcadero Center, 26th Floor
22 San Francisco, California 94111
23 BY: WARRINGTON PARKER, ESQ.
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25 CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004.
BY: CRINESHA B. BERRY, ESQ.
Telephone: (202) 688-3435
Email: Cberry@crowell.com

26 FOR FASTCASE AND THE WITNESS:

27 (Via Zoom Videoconference)
28 ASHBY & GEDDES
29 500 Delaware Avenue, 8th Floor
Wilmington, DE 19801
30 Telephone: 302-504-3707
Email: CGaul@ashbygeddes.com

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EXHIBIT 28

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs/Counterdefendants
v.

ROSS INTELLIGENCE INC.,
Defendant/Counterclaimant.

1:20-cv-00613-SB

**CONFIDENTIAL, HIGHLY
CONFIDENTIAL – ATTORNEYS’ EYES
ONLY**

**REPORT OF DEFENDANT/ COUNTERCLAIMANT’S EXPERT
L. KARL BRANTING, J.D., Ph.D.**

I.	Introduction.....	1
II.	Qualifications	2
III.	Confidentiality	5
IV.	Information Considered	5
V.	Summary of Opinions	6

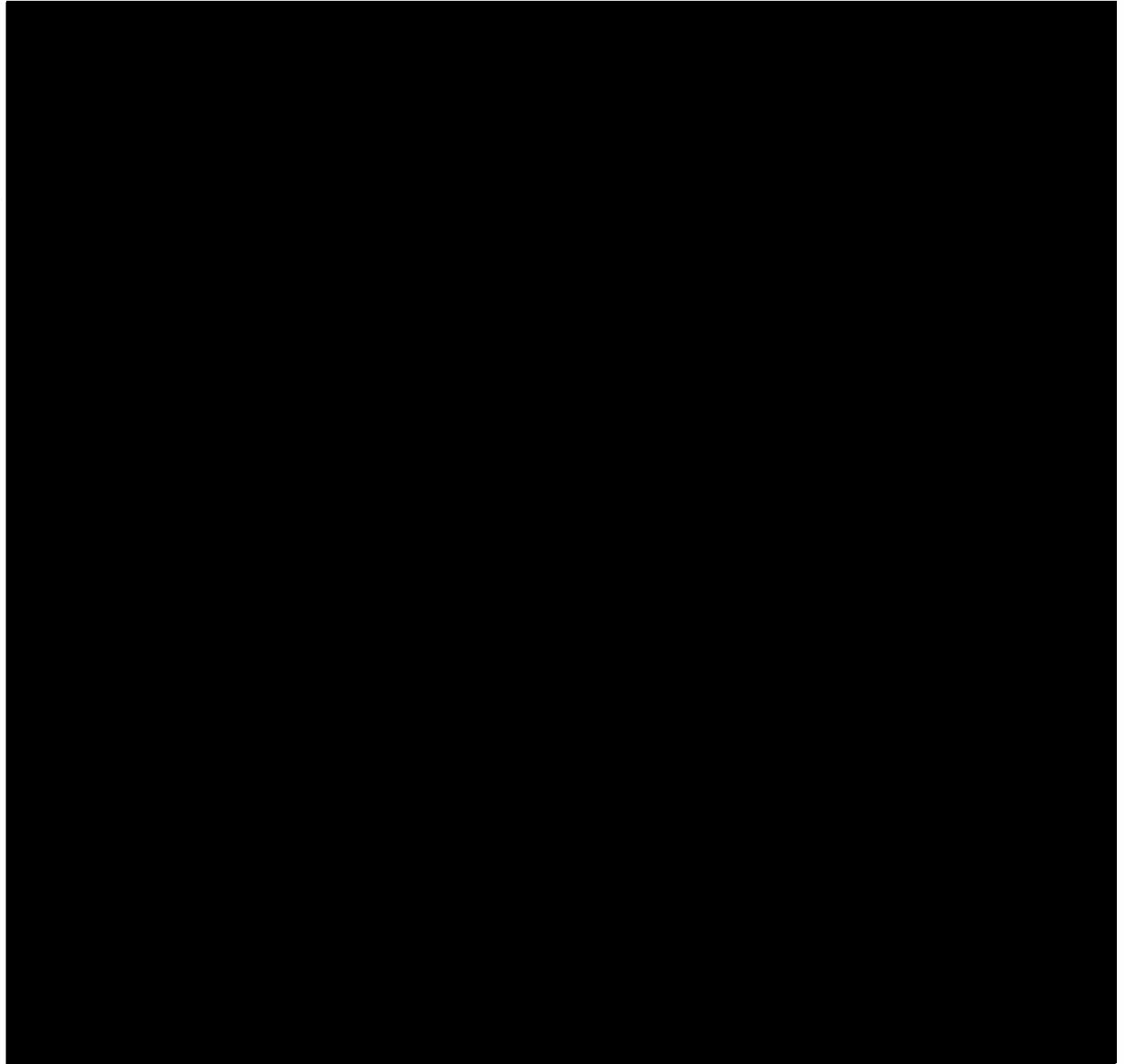


EXHIBIT 29

**EXPERT REPORT
OF
ALAN J. COX, PH.D.**

In Connection with

Ross Intelligence Inc. v. Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation,

Case No. 1:20-cv-00613-SB

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

June 1, 2023

CONFIDENTIAL—ATTORNEYS’ EYES ONLY

NATIONAL ECONOMIC RESEARCH ASSOCIATES

FOUR EMBARCADERO CENTER, SUITE 400
SAN FRANCISCO, CA 94111

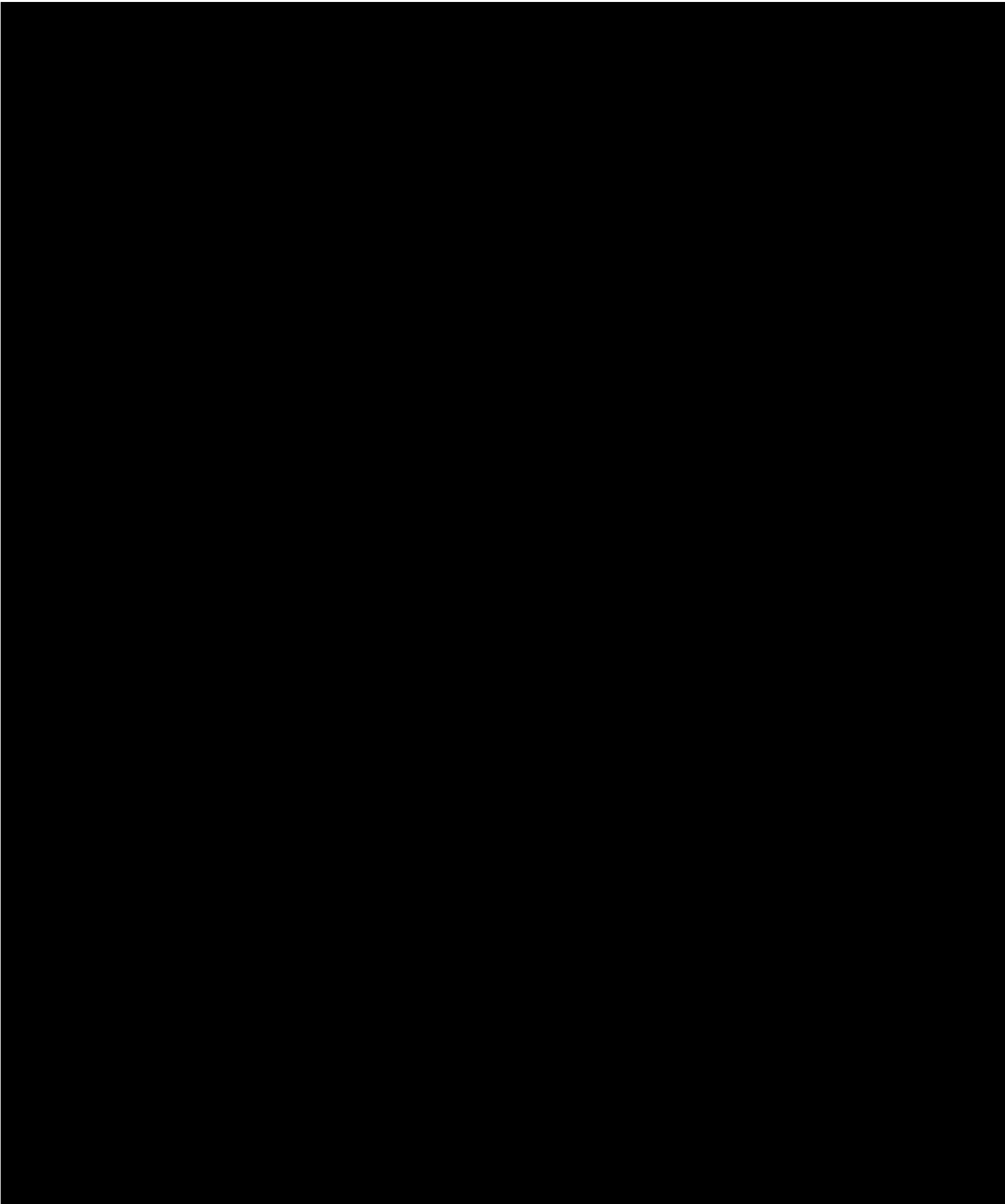
TELEPHONE: 415.291.1000 FACSIMILE: 415.291.1020

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

Highly Confidential – Attorneys’ Eyes Only



Highly Confidential – Attorneys’ Eyes Only

Highly Confidential – Attorneys’ Eyes Only

Highly Confidential – Attorneys’ Eyes Only

EXHIBIT 30

**EXPERT REPLY REPORT
OF
ALAN J. COX, PH.D.**

In Connection with

Ross Intelligence Inc. v. Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation,

Case No. 1:20-cv-00613-SB

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

July 20, 2023

CONFIDENTIAL—ATTORNEYS’ EYES ONLY

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